

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

SCH No. 2018061024

SUBJECT: De Anza Natural Amendment to the Mission Bay Park Master Plan

Applicant: City of San Diego City Planning Department

FINAL DOCUMENT – November 6, 2023

In response to comments received during public review, minor revisions and clarifications have been made to the document, which do not change the conclusions of the Draft Program Environmental Impact Report (PEIR) regarding the project’s potential environmental impacts and required mitigation. As defined in the California Environmental Quality Act (CEQA) Guidelines Section 15088.5, minor revisions and clarifications to the document – which are shown in ~~strikeout~~/underline format – do not represent “significant new information” and therefore, recirculation of the Draft PEIR is not warranted. No new significant environmental impacts would occur from these modifications, and similarly, no substantial increase in the severity of environmental impacts would occur.

PROJECT DESCRIPTION:

The City is proposing a De Anza Natural Amendment to the Mission Bay Park Master Plan, which is a comprehensive planning document that provides a policy framework to guide development throughout Mission Bay. The proposed amendment includes recommendations to serve local and regional recreation needs while preserving the natural resources of the De Anza Cove area. The proposed amendment aims to expand the park’s natural habitat and improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect against the risk of climate change, in line with the Climate Resilient SD plan. The proposed amendment would enhance the existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations, active and passive recreational opportunities to enhance public use of the area, and improved access to recreational uses. Finally, the proposed amendment recognizes the history and ancestral homelands of the Iipay-Tipay Kumeyaay people, providing opportunities to partner and collaborate on the planning and restoration of the area. The amendment seeks to implement the recommendations of the adopted Mission Bay Park Master Plan.

PROJECT LOCATION:

De Anza Cove is located in the northeast corner of Mission Bay Park in the City of San Diego. The project area consists of approximately 314 acres of land and includes approximately 191.2 acres of open water for a total of approximately 505.2 acres. The project area is bounded to the east by Mission Bay Drive, the north by Grand Avenue (on the eastern portion of the project area) and Pacific Beach Drive (on the western portion), the west by Crown Point Drive, and the south by Mission Bay. The Rose Creek inlet bisects the project area into eastern and western portions.

The project area includes the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve, Campland on the Bay, Pacific Beach Tennis Club athletic fields, Mission Bay Golf Course and Practice Center, and De Anza Cove area, including a vacated mobile home park and supporting infrastructure, Mission Bay RV Resort, public park, public beach, parking, and water areas.

The project area is located within the Coastal Overlay Zone. Additionally, Multi-Habitat Planning Area lands are located along a portion of Rose Creek within the project area.

ENVIRONMENTAL DETERMINATION:

The purpose of this document is to inform decision-makers, agencies, and the public of the significant environmental effects that could result if the project is approved and implemented, identify possible ways to minimize the significant effects, and describe a reasonable range of alternatives to the project.

Based on the analysis conducted for the project described above, the City of San Diego has prepared the following Final PEIR in accordance with CEQA. The analysis conducted identified that the proposed project could result in significant and unavoidable impacts in the area of **Historical, Archaeological, and Tribal Cultural Resources**. All other impacts analyzed in this Final PEIR were found to be less than significant.

This document has been prepared by the City of San Diego's City Planning Department and is based on the City's independent analysis and determinations made pursuant to Section 21082.1 of the California Environmental Quality Act (CEQA) and Section 128.0103(a) and (b) of the San Diego Municipal Code.

RESULTS OF PUBLIC REVIEW:

- () No comments were received during the public input period.
- () Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.
- (X) Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.



Rebecca Malone, AICP, Program Manager
City Planning Department

March 6, 2023
Date of Draft Report

November 6, 2023
Date of Final Report

Analyst: Jordan Moore, City Planning Department

PUBLIC REVIEW DISTRIBUTION:

The following agencies, organizations, and individuals received a copy or notice of the Draft PEIR and were invited to comment on its accuracy and sufficiency. Copies of the Draft PEIR and any technical appendices may be reviewed in the office of the City Planning Department or purchased for the cost of reproduction.

Federal Government

U.S. Environmental Protection Agency (19)
U.S. Fish and Wildlife Service (23)
U.S. Army Corps of Engineers (26)

State of California

Caltrans District 11 (31)
California Dept. of Fish & Wildlife (32)
California Environmental Protection Agency (37A)
Department of Toxic Substance Control (39)
California Natural Resources Agency (43)
Regional Water Quality Control Board (44)
State Clearinghouse (46)
California Coastal Commission (47)
California Air Resources Board (49)
California Transportation Commission (51)
California Dept of Transportation (51A)
California Boating and Waterways (52)
California State Coastal Conservancy (54)
Water Resources Control Board (55)
Native American Heritage Commission (56)
California Department of Conservation (60)
California State Lands Commission (62)
University of California Natural Reserve System

County of San Diego

County Vector Control (63)
Air Pollution Control District (65)
County of San Diego Department of Planning and Development Services (68)
County Water Authority (73)
Department of Environmental Health – Hazardous Materials Management Division (75)
Department of Environmental Health – Land and Water Division (76)

City of San Diego

Office of the Mayor (91)
Council President Elo-Rivera, District 9
Councilmember LaCava, District 1
Councilmember Campbell, District 2
Councilmember Whitburn, District 3
Council President Pro Tem Montgomery-Steppe, District 4
Councilmember von Wilpert, District 5
Councilmember Lee, District 6
Councilmember Campillo, District 7
Councilmember Moreno, District 8

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Library Department

Library Department-Gov. Documents (81)
Central Library (81A)

Balboa Branch Library (81B)
Clairemont Branch Library (81H)
Linda Vista Branch Library (81M)
North Clairemont Branch Library (81S)
Ocean Beach Branch Library (81V)
Pacific Beach/Taylor Branch Library (81X)
Point Loma/Hervey Branch Library (81Z)

City Advisory Boards and Commissions

Park and Recreation Board (83)
Historical Resources Board (87)
Wetlands Advisory Board (91A)
Park Development (93)
Mission Bay Park Committee (318A)

Other Governments

City of Chula Vista (94)
City of Coronado (95)
City of Del Mar (96)
City of El Cajon (97)
City of Escondido (98)
City of Imperial Beach (99)
City of La Mesa (100)
City of Lemon Grove (101)
City of National City (102)
City of Poway (103)
City of Santee (104)
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San Diego County Regional Airport Authority (110)
Metropolitan Transit System (112)
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School Districts

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Community Planning Groups

Community Planning Committee (194)
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Ocean Beach Planning Board (367)
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Town and Community Councils

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Native American

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Sycuan Band of Mission Indians (225H)
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Mesa Grande Band of Mission Indians (225J)
San Pasqual Band of Mission Indians (225K)
Ipai Nation of Santa Ysabel (225L)
La Jolla Band of Mission Indians (225M)
Pala Band of Mission Indians (225N)
Pauma Band of Mission Indians (225O)
Pechanga Band of Mission Indians (225P)
Rincon Band of Luiseno Indians (225Q)
San Luis Rey Band of Luiseno Indians (225R)
Los Coyotes Band of Mission Indians (225S)

Other Interested Agencies, Organizations and Individuals

University of California San Diego Library – Government Document Unit (134)
UCSD Physical & Community Planning (277)
Daily Transcript (135)
San Diego Chamber of Commerce (157)
The San Diego River Park Foundation (163)
San Diego River Coalition (164)
Sierra Club San Diego Chapter (165)
Neighborhood Canyon Creek and Park Groups (165A)
San Diego Canyonlands (165A)
San Diego Natural History Museum (166)
San Diego Audubon Society (167)
Jim Peugh (167A)
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San Diego Tracking Team (187)
League of Women Voters (192)
Community Planners Committee (194)
Carmen Lucas (206)
South Coastal Information Center (210)
San Diego Historical Society (211)
San Diego Archaeological Center (212)
Save Our Heritage Organization (214)

Ron Chrisman (215)
Clint Linton (215B)
Frank Brown - Inter-Tribal Cultural Resource Council (216)
Campo Band of Mission Indians (217)
San Diego County Archaeological Society Inc. (218)
Surfers Tired of Pollution (318)
Friends of Rose Canyon (320)
Pat Gallagher (322A)
Mission Bay Lessees (323)
Beautiful Pacific Beach
Discover Pacific Beach
Mission Bay Gateway Project
Campland on the Bay
Friends of Campland
Community Health Improvement Partners
Equinox Center
The San Diego Foundation
Friend of Mission Bay Marshes
Rose Creek Watershed Alliance
Surfrider Foundation – San Diego Chapter
Mission Bay Golf Course
Municipal Golf Association
Mission Bay Aquatic Center
Mission Bay Rowing Association
Mission Bay Yacht Club
Pacific Beach Tennis Club
ReWild Mission Bay
Fiesta Island Dog Owners Association (FIDO)
San Diego County Democrats for Environmental Action
Sustainability Matters
Handa Ornithology Lab
Environmental Center of San Diego
Other Interested Parties

**DE ANZA NATURAL
AMENDMENT TO THE MISSION BAY PARK MASTER PLAN**

**FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT
SCH #2018061024**

Prepared for:

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November 2023

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- D. Biological Resources Technical Report
- E. Greenhouse Gas Emissions Analysis Technical Memorandum
- F. Phase I Environmental Site Assessment Technical Memorandum
- G. Cultural Resources Constraints Technical Memorandum
- H. Historical Resources Constraints Technical Memorandum
- I. Hydrology and Water Quality Technical Memorandum
- J. Noise Technical Memorandum
- K. Paleontological Resources Technical Memorandum
- L. Transportation Impact Analysis
- M. Geotechnical and Geological Hazards Technical Memorandum
- N. Sea Level Rise Assessment Technical Report

Acronyms and Abbreviations

µg/m ³	micrograms per cubic meter
°C	degrees Celsius
°F	degrees Fahrenheit
2021 Regional Plan	San Diego Forward: The Regional Plan
AB	Assembly Bill
ADA	Americans with Disabilities Act
ADT	average daily traffic
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
amsl	above mean sea level
APE	area of potential effect
ASHRAE	American Society of Heating, Refrigerating and Air-Conditioning Engineers
ASMD	Area-Specific Management Directive
BASASP	Balboa Avenue Station Area Specific Plan
BMP	best management practice
CAA	federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standard Code
Caltrans	California Department of Transportation
Campland	Campland on the Bay
CAP	Climate Action Plan
CARB	California Air Resources Board
CCA	California Coastal Act
CCC	California Coastal Commission
CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFGF	California Fish and Game Code
CFR	Code of Federal Regulations

CH ₄	methane
City	City of San Diego
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
Commission	California State Lands Commission
Complete Communities Program	Complete Communities: Housing Solutions and Mobility Choices
County	County of San Diego
COZ	Coastal Overlay Zone
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dba	A-weighted decibel
DEHQ/HMD	County of San Diego Department of Environmental Health and Quality Hazardous Materials Division
DOC	California Department of Conservation
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
EDR	Environmental Data Resources
EIR	Environmental Impact Report
EO	Executive Order
ESA	Environmental Site Assessment
ESL	Environmentally Sensitive Lands
FEMA	Federal Emergency Management Agency
FESA	federal Endangered Species Act
FRA	Federal Responsibility Area
GDP	General Development Plan
GHG	greenhouse gas
GIS	geographic information system
GWP	global warming potential
HA	hydrologic area
HAP	hazardous air pollutant
HARP 2	Hotspots Analysis and Reporting Program Version 2
HMD	San Diego County Hazardous Materials Division
HOV	high occupancy vehicle
HU	hydrologic unit
IPCC	Intergovernmental Panel on Climate Change
KFMR/NWP	Kendall-Frost Marsh Reserve/Northern Wildlife Preserve
LCFS	Low Carbon Fuel Standard
LCP	Local Coastal Program
LDC	Land Development Code
LDM	Land Development Manual

L_{eq}	equivalent continuous sound level (time-averaged sound level)
L_{eq} 12-hr	12-hour A-weighted equivalent sound level
L_{eq} 1-hr	1-hour A-weighted equivalent sound level
$L_{eq}(h)$	A-weighted equivalent sound level
LID	Low Impact Development
L_{max}	maximum sound level during the measurement interval
LOSSAN	Los Angeles–San Diego–San Luis Obispo
LRA	Local Responsibility Area
LUAG	Land Use Adjacency Guidelines
MBPMP	Mission Bay Park Master Plan
MBTA	Migratory Bird Treaty Act
MBTAG	Mission Bay Tennis Center, Athletic Fields, and Golf Course
MCAS	Marine Corps Air Station
MEIR	maximally exposed individual resident
mg/m^3	milligrams per cubic meter
MHPA	Multi-Habitat Planning Area
MJHMP	Multi-Jurisdictional Hazard Mitigation Plan
MMT	million metric tons
Mobility Choices Program	Complete Communities: Mobility Choices
MPO	Metropolitan Planning Organization
MS4	Municipal Separate Storm Sewer System
MSCP	Multiple Species Conservation Program
MT	metric tons
MTS	Metropolitan Transit System
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	California Native American Heritage Commission
NCCP	Natural Community Conservation Planning
NF_3	nitrogen trifluoride
NO_2	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NOP	Notice of Preparation
NO_x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NRMP	Natural Resource Management Plan
O_3	ozone
OEHHA	Office of Environmental Health Hazard Assessment
Ozone Plan	Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County
Pacific Beach CP/LCP	Pacific Beach Community Plan and Local Coastal Program Land Use Plan
PCB	polychlorinated biphenyl
PEIR	Program Environmental Impact Report
PM_{10}	particulate matter less than 10 microns
$PM_{2.5}$	particulate matter less than 2.5 microns
Porter-Cologne Act	Porter-Cologne Water Quality Control Act

ppb	parts per billion
ppm	parts per million by volume
PPV	peak particle velocity
RAQS	Regional Air Quality Strategy
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
Regional Bike Plan	Riding to 2050: San Diego Regional Bike Plan
REL	reference exposure level
Reporting Rule	Final Mandatory Greenhouse Gas Reporting Rule
ReWild Feasibility Study	ReWild Mission Bay: Wetlands Restoration Feasibility Study Report
RMP	Risk Management Plan
RPS	Renewable Portfolio Standard
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SAP	Subarea Plan
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCS	Sustainable Communities Strategy
SDAB or basin	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SDBG	San Diego Biological Guidelines
SDIA	San Diego International Airport
SEL	sound exposure level
SEP	Supplemental Environmental Project
SF ₆	sulfur hexafluoride
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SO _x	sulfur
SRA	State Responsibility Area
SSA	Special Study Area
SWPPP	Stormwater Pollution Prevention Plan
SWQMP	Stormwater Quality Management Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCR	Tribal Cultural Resource
UC San Diego	University of California, San Diego
Unified Program	Unified Hazardous Waste and Hazardous Materials Management Regulatory Program
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VdB	vibration decibel
VMT	vehicle miles traveled
VOC	volatile organic compound



Comment Letters and Responses

According to the California Environmental Quality Act (CEQA) Guidelines, Section 15088(a), “the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a response.” This chapter provides all written comments received on the Draft Program Environmental Impact Report (Draft PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project) during the 45-day public review period (March 6, 2023, through April 20, 2023), and the City of San Diego’s (City’s) responses to each comment.

A total of 656 comment letters were received during the public review period. Comment letters and specific comments are given letters and numbers for reference purposes (e.g. “Letter F1”). Specific comments within each letter are identified by a designator in the page margin that reflects the sequence of the specific comment within the correspondence (e.g. “F1-1” for the first comment in Letter F1). Table RTC-1, List of Commenting Agencies, Organizations, and Individuals, lists the agencies, organizations, and individuals who submitted comments on the Draft PEIR during the public review period.

City responses are marked with the same number-letter designator as the comment to which they respond. Responses focus on comments that raise environmental issues or pertain to the adequacy of analysis in the Draft PEIR or to other aspects pertinent to the potential effects of the proposed Amendment on the environment pursuant to CEQA. Comments that address policy issues, opinions or other topics beyond the purview of the Draft PEIR or CEQA are noted as such for the public record. Where comments are on the merits of the proposed Amendment rather than on the Draft PEIR, these are also noted in the responses. Where appropriate, the information and/or revisions suggested in the comment letters have been incorporated into the Final PEIR. Where sections of the PEIR are excerpted in this document, the sections are indented. Changes to Draft PEIR text are shown in underlined text for additions and strikeout text for deletions.

The public comment letters and corresponding City responses follow.

Table RTC-1. List of Commenting Agencies, Organizations, and Individuals	
Letter	Commenter
Federal Agencies	
F1	U.S. Fish and Wildlife Service
State Agencies	
S1	California Department of Transportation, District 11
S2	California Department of Fish and Wildlife, South Coast Region 5
S3	University of California San Diego Natural Reserve System
Local Agencies	
L1	San Diego Unified School District
L2	County of San Diego, Department of Environmental Health and Quality, Vector Control Program
L3	City of San Diego, Public Utilities Department
L4	San Diego Unified School District
L5	Regional Water Quality Control Board
Organizations	
O1	Save Our Access
O2	Pacific Youth Soccer League c/o California Coastal Works
O3	Mission Bay Lessees Association
O4	Pacific Beach Tennis Club
O5	Southern California Golf Association
O6	Environmental Center of San Diego
O7	Sierra Club, San Diego Chapter
O8	Friends of Rose Canyon
O9	J. Whalen Associates, Inc., on behalf of San Diego Mission Bay Boat and Ski Club
O10	Professional Golfers' Association of America, Southern California Section
O11	San Diego District Tennis Association
O12	San Diego Mission Bay Boat & Ski Club Board of Directors
O13	San Diego Natural History Museum
O14	Allen Matkins on behalf of Northeast MB, LLC and Campland, LLC
O15	Coastal Law Group on behalf of San Diego Audubon Society and Coastal Environmental Rights Foundation
O16	Friends of Rose Canyon
O17	Friends of Rose Creek
O18	Handa Ornithology Lab
O19	Mission Bay Youth Field Association
O20	Renascence Project
O21	ReWild Coalition
O22	San Diego Outrigger Canoe Club
O23	Southwest Wetlands Interpretive Association
Individuals	
I1	Bill Earley
I2	Richard Siegel
I3	Bill Crane
I4	Richard Siegel
I5	James Zamel

Table RTC-1. List of Commenting Agencies, Organizations, and Individuals	
Letter	Commenter
I6	Gener Abdon
I7	Frank Salazar
I8	Catherine Thiemann
I9	Kristin Grunklee
I10	Joanne Barron
I11	David Morrison
I12	Eric Ramirez
I13	Pamela Taylor
I14	Diane Parker
I15	Neal Parker
I16	Diane Fons
I17	Jason Mulvania
I18	Tim Fleming
I19	Derek Miller
I20	Jarrett Laurence
I21	Lesly Otto
I22	Randy Minnich
I23	Ray Bentsen
I24	Stephen Fulton
I25	Franklin Mitts
I26	Todd Callaway
I27	Terry Fyffe
I28	Caroly Barkow
I29	Tamara Cross
I30	John Squillace
I31	Melanie McDonald
I32	Andrew Smisek
I33	Kimberly Eastwood
I34	KT Martin
I35	Tena Ritter
I36	Jonathan Bora
I37	Craig Narta
I38	Elissa Edwards
I39	Maria Mullins
I40	Natalie Borhardt
I41	Hannah Butler
I42	Jacquelyn Stone
I43	John Canzone
I44	Brian
I45	Ann Dynes
I46	Calistia Griebel
I47	Murphy Rasmussen
I48	Leslie Dufour
I49	Jackie Niznik

Table RTC-1. List of Commenting Agencies, Organizations, and Individuals	
Letter	Commenter
I50	Christopher Rogers
I51	Kurt Carlson
I52	Gary Fouts and Carol Renzulli
I53	Rose Hanscom
I54	Leticia Heredia
I55	Judith Nicolaidis
I56	Robert Schreiber
I57	Nicole Weiss
I58	Michael Carter
I59	Louis Rodolico
I60	Debby Vos
I61	James Cameron
I62	Cleo Kelly
I63	John Akin
I64	Linda Fonfara
I65	Miriam Kimber
I66	Gracie Wareham
I67	Marisa Hernandez
I68	Judith Nicolaidis
I69	Ana Porraz
I70	Martin Baggott
I71	Rustom Jamadar
I72	Sherry Dikeman
I73	Christie Dunning
I74	Thomas DiCamillo
I75	Vickie DiCamillo
I76	Gordon Froehlich
I77	Rosemary Ayala
I78	Francescd
I79	E.I. Robbins
I80	Ann Dynes
I81	Joanna Hirst
I82	Debra Madden
I83	Elizabeth Mather
I84	Nadya Shubin
I85	Lesley Tibbetts
I86	Andrew Wiese
I87	Dan McKirnan
I88	Karina Ornelas
I89	Earl Pagan
I90	Jessica Ronquillo
I91	Paul Ross
I92	Louise Russell
I93	Kasey Schultz

Table RTC-1. List of Commenting Agencies, Organizations, and Individuals	
Letter	Commenter
I94	Love Zubiller
I95	Danett Abbott-Wicker
I96	Megan Abney
I97	Terri Allen
I98	Kim Altana
I99	Kenneth Althiser
I100	Marit Anderson
I101	Jennifer Ankele
I102	Armstrong
I104	Earl Balch
I105	Beverly Ball
I106	Graciela Barajas
I107	Mimi Barress
I108	Sandra Barton
I109	Elaine Barrett
I110	Keiko Barrett
I111	Corey Bassett
I112	Eowyn Bates
I113	Lynda Bauer
I114	Camila Bautista
I115	Lori Baxter
I116	Susan Bedford
I117	Melissa Behar
I118	Kathy Beitscher
I119	Mercedes Benet
I120	Barabra Benjamin
I121	Elaine Benjamin
I122	Kim Berger
I123	Brenda Bergstrom
I124	S.F. Bernardo
I125	Rover Bernhard
I126	Donald Betts
I127	Blaze Bhence
I128	Alice Bickers
I129	Amanda Bird
I130	Kathy Blackmarr
I131	Susan Blain
I132	John Bochenek
I133	John Bogut
I134	Richard Bold
I135	Lyn Booth
I136	Carol Boyd
I137	Julie Brickell
I138	Julia Broad

Table RTC-1. List of Commenting Agencies, Organizations, and Individuals	
Letter	Commenter
I139	Barbara Bruce
I140	Ben Brucker
I141	Carrie Brummette
I142	Connie Butler
I143	Doug Cain
I144	Susan Cameron-Brown
I145	K Campbell
I146	Keith Campbell
I147	Nydia Cardona
I148	David Carlson
I149	David Carp
I150	Dan Carroll
I151	Loretta Caruana
I152	Nicole Cervi-McKeever
I153	Lisa Chaddock
I154	Pete Childs
I155	Chase Choate
I156	Sarah Chotiner
I157	Ross Christie
I158	Keith Christy
I159	Robin Clark
I160	Robyn Class
I161	Angela Clayton
I162	Cynthia Clayton
I163	Mark Clumeck
I164	Luanne Coker
I165	Mary Collett
I166	Kay Collins
I167	Susan Coombs
I168	Betty Cooper
I169	Andrea Cornelius
I170	Stacy Cornelius
I171	Ann Coulston
I172	Maria Elena Crabb
I173	Taylor Crandall
I174	Carole Dadurka
I175	Wendy Dallas
I176	Pricilla Dalpra
I177	Rita Davenport
I178	Timothy Davis
I179	Jonathan Day
I180	Barbara De Shann
I181	Vivian Derr
I182	Jay Desgrosellier

Table RTC-1. List of Commenting Agencies, Organizations, and Individuals	
Letter	Commenter
I183	Barabra Diederichs
I184	Jacoba Dolloff
I185	Britton Donaldson
I186	Dawn Douglas
I187	Linda Douglas
I188	Steve Duarte
I189	Anne Dugaw
I190	Dawn Dulac
I191	Kathleen Lesli Dunn
I192	Christie Dunning
I193	Martin Edwards
I194	Anne Elliott
I195	Sherry Fatzinger
I196	Kathleen Fernandez
I197	Arthur Fink
I198	Allyson Finkel
I199	Paula Fitzgerald
I200	Fraa Fitzzz
I201	Johannah Frank
I202	Julia Frank
I203	Luis Fuentes
I204	G C
I205	G K
I206	Einar Gall
I207	Juanita Gama
I208	Armando Garcia
I209	Ked Garden
I210	Missy Garvin
I211	Michele Gelboin
I212	Megan Gibney
I213	Robert Giles
I214	Carrie Gingrich
I215	Joyce Glennon
I216	Daniel Goldberg
I217	Nerin Gonzalez
I218	Brian Gottejman
I219	Kathlyn Grabenstein
I220	Donna Grampp
I221	Liliana Griego
I222	Mason Griffith
I223	Michelle Grimes
I224	Alexis Grone
I225	Kurt Gross
I226	Eugenia Guilin

Table RTC-1. List of Commenting Agencies, Organizations, and Individuals	
Letter	Commenter
I227	Jill Gustafson
I228	Raul Gutierrez
I229	H C
I230	Dale Haas
I231	Karen Hafer
I232	Jennifer Hagglof
I233	Holly Hall
I234	Cathy Handzel
I235	Ilse Hanning
I236	Linda Heidt
I237	Patricia Heilig
I238	James Hemmick
I239	Karla Henderson
I240	Amber Heredia
I241	Crystal Hernandez
I242	Paul Hildebrand
I243	Nigella Hillgarth
I244	James Hodgdon
I245	Marcia Holcomb
I246	Diane Hollenbeck
I247	Mary Ella Holtam
I248	Deborah Honeycutt
I249	Terrance Hutchinson
I250	Erin ImHof
I251	Craig Jackson
I252	Alexis Jacovides
I253	Padma Jagannathan
I254	Diane Jaynes
I255	Elliot Jones
I256	Joshua Jones
I257	Linda K
I258	Chad Kapusta
I259	Lise Kastigar
I260	Murray Kaufman
I261	Gary Kent
I262	Richel Khoury
I263	Richel Khoury
I264	Christine Kim
I265	Gale Kirk
I266	Adrienne Kirkeby
I267	Carl Kish
I268	Barabra Klein-Robuck
I269	Russell Knipp
I270	John Knox

Table RTC-1. List of Commenting Agencies, Organizations, and Individuals	
Letter	Commenter
I271	Deborah Koken
I272	Vicki Kopinski
I273	Kelly Kramer
I274	Laura Kramer
I275	Kyoko Kremp
I276	Lazlo Kurucz
I277	Rochelle La Frinere
I278	Georgia Labey
I279	David Laguardia
I280	Deborah Lancman
I281	Dianne Lane
I282	Victoria Lea
I283	Enora Lecuyer
I284	Kathy Lee
I285	Tiana Lee
I286	Steve Leffler
I287	Lacy Levitt
I288	Jean Linder
I289	Florence Litton
I290	Ruth Logan
I291	John Lomac
I292	Barry Lovinger
I293	Carl Luhring
I294	Erin Luke
I295	Helen Lynn
I296	Yolanda Mariscal
I297	Sherly Marsh
I298	Karen Martien
I299	Margaret Martinovic
I300	Richard Martyn
I301	Kathleen Marvel
I302	Marcie Mason
I303	Mary Mason
I304	Gretchen Mavrovouniotis
I305	Michael Mavrovouniotis
I306	Barney McComas
I307	Sparrow McMorran
I308	Shannon McNeil
I309	Mike Merlesena
I310	Vanessa Metzler
I311	Michael Michel
I312	Mike
I313	Brandon Miller
I314	Kellie Miller

Table RTC-1. List of Commenting Agencies, Organizations, and Individuals	
Letter	Commenter
I315	Erin Millikin
I316	Sarah Millspaugh
I317	Liz Miranda
I318	Bonnie Mitchell
I319	Ian Monahan
I320	Valentina Montes
I321	Anthonia Monzon
I322	Brenna Morrissey
I323	John Morrissey
I324	Linda Morrissey
I325	Molly Morrissey
I326	Neil Morrissey
I327	Mohsin Mortada
I328	Mathew Mullen
I329	Heather Myers
I330	Teresa Mynko
I331	Pamela Nelson
I332	Justin Nichol
I333	Bonnie Nickel
I334	Tom Nulty
I335	Sofia Okolowicz
I336	Reid Oldenburg
I337	Elizabeth Oliver
I338	Karla Padilla
I339	Linda Pardy
I340	Rick Paulson
I341	Julie Pearce
I342	Brandy Pearson
I343	Bettina Pedersen
I344	Mitra Pejman
I345	Valerie Pelletier
I346	Rayza Perez
I347	Rachel Peterson
I348	Scott Pham
I349	Siena Picchi-Dobson
I350	Nuri Pierce
I351	Shannon Post
I352	Dale Powell
I353	Samuel Prentice
I354	Meredith Priestley
I355	Vaiva Pukite
I356	R D
I357	Belinda Rachman
I358	Gabriela Ramirez

Table RTC-1. List of Commenting Agencies, Organizations, and Individuals	
Letter	Commenter
I359	Lucero Ramos
I360	Dean Ranger
I361	Maryellen Redish
I362	John Riedel
I363	Ron Ringler
I364	Felicia Roberto
I365	Sandy Rodgers
I366	Lisa Rosa
I367	Robert Rosenblum
I368	Melanie Ross
I369	Susan Roy
I370	Lynne Russo
I371	S C
I372	Moktar Salama
I373	Alfa Santos
I374	Deborah Sargent
I375	Pamela Saulter
I376	Anthony Savoia
I377	Mary Savoia
I378	Sue Schaar
I379	Peter Scharnell
I380	Babara Scheinman
I381	Dennis Schepman
I382	Paulette Schindele
I383	Gloria Schlaepfer
I384	Joseph Schlageck
I385	Sherri Schottlaender
I386	Cynthia Schumacher
I387	Laurel Scott
I388	Nadine Scott
I389	Winke Self
I390	Jennifer Sevadjian
I391	Debra Shaw
I392	Judy Shively
I393	Evelyn Showley
I394	Elise Shtayyeh
I395	Cheryl Singleton
I396	Randle Sink
I397	Cathy Sleva
I398	Beverly Smith
I399	Veronica Smith
I400	Jan Snedegar
I401	Cynthia Snyder
I402	Naomi Sobo

Table RTC-1. List of Commenting Agencies, Organizations, and Individuals	
Letter	Commenter
I403	Robyn Spaulding
I404	Barbara Speidel
I405	Deb St. Onge
I406	Barbara Stanley
I407	Mary Stanley
I408	Neil Stanton
I409	Jan Stark
I410	Daniel Stevenson
I411	Brian Still
I412	Peggy Stone
I413	Ann Stratten
I414	Elizabeth Straus
I415	Courney Tassone
I416	Leslie Tate
I417	Joanne Tenney
I418	Brenda Thompson
I419	Louise Titlow
I420	Pati Tomsits
I421	Christine Trela
I422	Dannie Trouton
I423	Marian Tsongas
I424	Ilya Turov
I425	Meadow Two Feathers
I426	Manda Unser
I427	Tim Valentine
I428	Caroline Verba
I429	Liv Virta-Meyer
I430	Deepak Vohra
I431	Carol Vonsederholm
I432	Cristina Warren
I433	Kim Waterson
I434	Melanie Watson
I435	Sharon Weinapple
I436	Sally Westcott
I437	Darice Westwood
I438	Barbara White
I439	George Whitman
I440	Theresa Wiley
I441	Melissa Williams
I442	June Yamada
I443	Jean Yaremchuk
I444	YonkoTheZonko
I445	Jennifer York
I446	Tanya Young

Table RTC-1. List of Commenting Agencies, Organizations, and Individuals	
Letter	Commenter
I447	Sandy Zelasko
I448	Paul Ziegler
I449	Alexander Zukas
I450	Bradley Abramson
I451	Anne Adams
I452	Maria Aguirre
I453	Jennifer AllenPrather
I454	Valentina Annerino
I456	Angela Begley
I457	Cristina Berrios
I458	Aisha Blackwell
I459	Lisa Bostrack
I460	Michael Bova
I461	Carrie Boyajian
I462	Heather Brashear
I463	Gary Breckon
I464	Christy Brescia
I465	Kathy Brigger
I466	David Broady
I467	Mark Broido
I468	Peter Bryan
I469	Samuel Burns
I470	Kevin Bush
I471	Valerie Bushree
I473	Thomas Campbell
I474	Carey Capaldi
I475	Sasha Carter
I476	Louana Chapple
I477	Christopher Chatard
I478	Joel Chavez
I479	Michael Chichester
I480	Lui Chungus
I481	Vickie Church
I482	Ad Clayton
I483	Steven Collins
I484	Kimberlin Correia
I485	Kim Cruz
I486	Katherine Curry
I487	Mark D'Andrea
I488	Joan Davis
I489	Hue Devine
I490	Gwendolyn Dick
I491	Jerry Dilley
I492	John Donnelly

Table RTC-1. List of Commenting Agencies, Organizations, and Individuals	
Letter	Commenter
I493	Kyle Dreher
I494	Shirleen Dreyer
I495	Cam Dudley
I496	Laura Dufel
I497	Bettina Eastman
I498	Joyce Edwards
I500	Samantha Esquivel
I501	Teresa Estupinan
I502	Hope Ezeani
I503	Jerry Gaeir
I504	Stephen Gallagher
I505	Terry Gant
I506	Dan Gaudette
I507	James Gerard
I508	Charles Goodman
I509	Michael Groeger
I510	Louis Gurule
I511	Daniel Guterman
I512	Dave Hammel
I513	Susie Hannon
I514	Alvin Hartwick
I515	Clayton Hayes
I516	Karen Haze
I517	Gloria and Steve Henson
I518	Kathleen Herring
I519	Adam Hjorth
I520	Mary Hoff
I521	Alex Holstein
I522	Mike Hooe
I523	Terri Hughes-Oelrich
I524	Jerry Johnson
I525	Susan Jordan
I526	Vanessa Kantrud
I527	Dale Kepler
I528	Jackie Kim
I529	John Knox
I530	John Kramer
I531	Carrie Kunberger
I532	Megan Lopez
I533	Heidi Lynn
I534	Veronica M
I535	Michele Mallonee
I536	Amira Mansour
I537	Ron Martens

Table RTC-1. List of Commenting Agencies, Organizations, and Individuals	
Letter	Commenter
I538	Paula Masiulewicz
I539	Anneliesel Mckimmy
I540	Mura McNeal
I541	Thomas McVay
I542	Charnell Merrill
I543	Barbara Meyer
I544	Jesse Meyer
I545	Noah Meyer
I546	Rita Meza
I547	Julie Mindzora
I548	Paul Monacelli
I549	Glenn Morris
I550	Scott Mueller
I551	Erica Murray
I552	Chuck Muth
I553	R.S. Newkirk
I554	Ann Nicholson
I555	Margaret Nielsen
I556	Terri Oelrich
I557	Karina Ornelas
I558	Mia Ortiz
I559	Regina P.B.
I560	Dianne Padget
I561	Cheryl Paraiso
I562	Melissa Parham
I563	Patrick Park
I564	Kellee Parrish
I565	John Pasqua
I566	Shannon Patty
I567	Cynthia Pencek
I568	Perry Pensky
I569	Tyler Perfect
I570	Emmett Pesta
I571	Marc Petein
I572	Susan Petrella
I573	Patricia Pike
I574	Dorothy Pinedo
I575	Marcus Platt
I576	Kristy Pogue
I577	Teri Polley-Michea
I578	Shanna Powell-Mayhue
I579	Mary Pudenz
I580	Cameron Rados
I581	Keith Rainville

Table RTC-1. List of Commenting Agencies, Organizations, and Individuals	
Letter	Commenter
I582	Robert Reinking
I583	Nan Renner
I584	Cherry Robinson
I585	Yvonne Roper
I586	Babette Rose
I587	Jo Ross
I588	Roidina Salisbury
I589	Ken Savoca
I590	Benjamin Scoggins
I591	David Scott
I592	Richard Shelton
I593	Laura Short
I594	Christina Solko
I595	Muriel Spooner
I596	Marcy Storm
I597	Don Strazzabosco
I598	Beth Sundheim
I599	Phil Tan
I600	Janis Terry
I601	Andy Tomsky
I602	Justin Tracey
I603	Cynthia Trosper
I604	Corinne Underwood
I605	Maria Veghte
I606	Bernadette Villaneda
I607	Daniel Villaneda
I608	Ellen Wade
I609	John Wall
I610	Glenn Watje
I611	Nancy Watson
I612	Coral Weaver
I613	Phil Weber
I614	Mark Wescott
I615	Ruth White
I616	Aryn Wilder
I617	Krystal Wilson
I618	Greg Winton
I619	Eva Yakutis
I620	Mike Yoho
I621	Nichole Zarate
I622	Joanne Zelnick
I623	Adriana Zuniga
I624	John Riedel
I625	Julia Curry

Comment Letter F1: U.S. Fish and Wildlife Service, May 9, 2023



United States Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
 Ecological Services
 Carlsbad Fish and Wildlife Office
 2177 Salk Avenue, Suite 250
 Carlsbad, California 92008



F1

In Reply Refer to:
 2023-0674614-CEQA-DPEIR_SD

May 9, 2023
 Sent Electronically

Scott Sandel
 Park Designer
 City of San Diego Planning Department
 9485 Aero Drive, MS 413
 San Diego, California 92123

Subject: De Anza Natural Amendment to the Mission Bay Park Master Plan and De Anza Natural Amendment to the Mission Bay Park Master Plan Program Environmental Impact Report

Dear Scott Sandel:

F1-1

The U.S. Fish and Wildlife Service (Service) is writing in response to the City of San Diego's (City) Draft Amendment to the Mission Bay Park Master Plan (Amendment) and Draft Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan. We received two extensions to provide comments, the first until May 4th by Jordan Moore with the City Planning Department and the second until May 11th by Rebecca Malons, Program Manager, Environmental Policy. The Service appreciates the City's flexibility and the additional time. Our comments and recommendations are based on our knowledge of sensitive and declining vegetation communities and species in Mission Bay, the Mission Bay Master Plan Update (Master Plan), the City's Multiple Species Conservation Program (MSCP) Subarea Plan (SAP), the Mission Bay Park Natural Resource Management Plan (NRMP), and our participation on the Wetlands Working Group and Scientific and Technical Advisory Committee for the ReWild Mission Bay Project.

The Service previously provided comments to the City concerning the Amendment and other similar projects in the same area with different names (i.e., De Anza Revitalization Plan, De Anza Cove Amendment to the Mission Bay Park Master Plan) in letters dated December 7, 2016, August 10, 2017, July 11, 2018, and February 16, 2022. We are reiterating our prior comments and recommendations that were not addressed in the Amendment or the PEIR.

F1-2

The mission of the Service is working with others to conserve, protect, and enhance fish, wildlife, plants, and their habitats for the continuing benefit of the American people. Consistent with our mission, we have been working with partners to improve conditions for habitat, wildlife, and the human community in northeast Mission Bay. Within the project area, the Service provided funding and technical assistance to San Diego Audubon for the ReWild Mission Bay Wetlands Restoration Feasibility Study Report (ReWild Feasibility Study) and to San Diego Earth Works

F1-1: This comment provides an introduction to the comment letter and states the time extensions the City of San Diego (City) has allowed to provide comments. The City appreciates the United States Fish and Wildlife Service (USFWS) participation in the review of the Draft Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

F1-2: This comment summarizes USFWS's role on previous projects in the Mission Bay area and under the federal Endangered Species Act of 1973. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft PEIR. Therefore, no further response is warranted.

F1-2
cont.

and University of California Reserve System for their Transition Zone Habitat Restoration Project at the Kendall-Frost Marsh Reserve. The Service also has legal responsibility for the welfare of migratory birds, anadromous fish, and threatened and endangered animals and plants occurring in the United States, and is responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCP) developed under section 10(a)(1) of the Act. The City participates in the HCP program by implementing its approved SAP.

Project Location

The project area is at the northeast corner of Mission Bay Park in the City. Land uses in the Amendment area include Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (Preserve); a private resort for recreational vehicle (RV) and tent camping operated by Campland on the Bay (Campland); athletic fields, tennis courts, golf course, and the De Anza Cove area, which includes the De Anza Special Study Area identified in the Master Plan. The Preserve consists mostly of saltmarsh wetland and is in the far west corner of the Amendment area, bordered on the west and north by residential development and roadways, on the east by Campland, and on the south by Mission Bay. Campland is located between the Preserve and Rose Creek and is on City-owned land. North Mission Bay Drive bisects the project area east of Rose creek with the De Anza Cove area to the south and active recreational areas to the north. The De Anza Cove area consists of open water, a vacant mobile home park and supporting infrastructure (e.g., roads, utilities, parking lots, and driveways), an RV resort (Mission Bay RV resort) also operated by Campland, a public park, beach, and parking area. Current active recreational areas include the tennis club, athletic fields, and golf course.

F1-3

Project Description

The proposed project is the Amendment to the Master Plan to expand natural habitat and improve water quality; enhance the existing Regional Parkland by providing a variety of uses, including low-cost visitor guest accommodations (recreational vehicles and other low-cost camping facilities); and active and passive recreational opportunities. The Amendment will adopt the De Anza Natural alternative which includes the following components: 86.8 acres Preserve;¹ 140.5 acres of restored marshland west and east of Rose Creek; 60.1 acres of active recreational facilities including lighted fields and courts, a shared clubhouse and parking for land-based recreation (e.g., tennis, sand volleyball, walking, cycling, and inline/roller skating), and boat facility; 37.4 acres of upland and buffer area accommodating passive recreation amenities such as overlooks, multi-use pathways, picnic areas, and signage. Project components also include 48.5 acres of low-cost visitor guest accommodations east of Rose Creek including camping sites for RVs, cabins, eco-friendly accommodations, and associated open space and facilities consistent with camping accommodations; 26.3 acres of Regional Parkland including multi-use paths, open green, a nature interpretive center, children's play areas, parking, restrooms and picnic shelters; and 5.5 acres of open beach at the northern and western edges of De Anza Cove adjacent to open

¹ The project description in the PEIR does not call out the 86.8 acres in the Preserve separate from the 140.5 acres of restoration.

F1-3: This comment provides a summary of the project location and description as found in the PEIR. This comment also provides a summary of the project alternatives evaluated in the PEIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

F1-3
cont.

water designated for non-motorized boat use. Water quality design features are proposed along the edges of the active recreation areas to capture and treat storm water before it flows into Mission Bay. Parking lots, vehicle, bicycle and pedestrian access routes are proposed from North Mission Bay Drive, Pacific Beach Drive, and Grand Avenue.

The PEIR evaluates the Amendment and its associated adoption of De Anza Natural alternative and the following three other alternatives: Enhanced Wetlands/Optimized Parkland, Resiliency Optimized, and Wetland Optimized. The PEIR evaluates the Wetlands Optimized Alternative at the same level as the analysis of De Anza Natural alternative per the City Supplemental Environmental Project per the Settlement Agreement and Stipulation for Entry of Administrative Civil Liability Order No. R9-2020-0150 (SEP). The PEIR identifies the Enhanced Wetlands/Optimized Parkland Alternative as the environmentally superior alternative.

F1-4

The Service has reviewed the Amendment and the PEIR and appreciates that the De Anza Natural and three other alternatives in the PEIR include restoration of a combination of wetland and upland habitat within existing developed area west of Rose Creek contiguous with existing habitat at the Preserve and Rose Creek, east and adjacent to Rose Creek, and within De Anza Cove. The habitat restoration in the Amendment area, along with the wetland restoration proposed on north Fiesta Island, will help achieve the environmental goals of the Master Plan and NRMP.

F1-5

Our comments address both the Amendment and the PEIR. Our main concern is that the proposed Amendment for the De Anza Natural alternative reduces the environmental goals of the Master Plan. We believe the ReWild Wildest Alternative is the best alternative to achieve the environmental goals of the Master Plan and request that it be adopted instead of the De Anza Natural alternative. We are also concerned that the PEIR lacks the detail necessary to evaluate the potential impacts and benefits of the alternatives. We request that the City address our comments and that the Wildlife Agencies have an opportunity to review and comment, if necessary, on the revisions prior to the finalization of the Amendment and PEIR.

We provide additional details on our comments and concerns on the Amendment and PEIR below:

Meeting the Environmental Goals of the Master Plan and NRMP

F1-6

The City's SAP relies on the Master Plan to fulfill its environmental goals for Mission Bay and states that lands in the City will be managed pursuant to existing Natural Resource Management Plans, including the Mission Bay NRMP. In addition, the City developed the Biology Guidelines to ensure that the biological goals and objectives of the SAP are met. The environmental goals of the Master Plan and NRMP were established to help offset the historic loss of coastal wetlands, which has continued since these plans were completed. Therefore, consistent with our mission, we continue to urge the City to approve an amendment that meets the environmental goals of the Master Plan and NRMP.

Environmental Goals in the Master Plan include expansion of habitat areas for sensitive species and adequate buffers to protect sensitive environmental resources from incompatible land uses

F1-4: This comment provides support for the restoration of a combination of wetland and upland habitat in the De Anza Natural Amendment to the Mission Bay Park Master Plan (Amendment) area. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

F1-5: This comment expresses the USFWS's main concern that the proposed Amendment for the De Anza Natural alternative reduces the environmental goals of the Master Plan. Appendix B of the PEIR provides an analysis of the project's consistency with the goals and objectives of the Mission Bay Park Master Plan (MBPMP). Specifically, the project would promote MBPMP policies that support the expansion of open space by removing Campland on the Bay (Campland) and replacing it with a natural habitat area contiguous with the existing Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP). The project would sustain and enhance the biodiversity of the KFMR/NWP and expand natural habitat areas contiguous to this existing preserve.

Further this comment provides support for the ReWild "Wildest" alternative and requests that it be adopted instead of the project. The USFWS's support for the ReWild "Wildest" alternative is noted. The comment also expresses concern that the PEIR lacks the detail necessary to evaluate the potential impacts and benefits of the alternatives. The PEIR identifies a reasonable range of alternatives pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6. PEIR Chapter 8.0, Alternatives, evaluates four alternatives that would reduce impacts compared to the proposed project (No Project/No Build Alternative,

Wetlands Optimized Alternative, Enhanced Wetlands/Optimized Parkland Alternative, and Resiliency Optimized Alternative). The PEIR goes above the requirements of CEQA by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b). The ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives are discussed in Section 8.2, Alternatives Considered and Eliminated.

The MBPMP calls for a “balanced approach” with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project proposes 146.5 acres of active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

The “Wild” and “Wildest” alternatives would not fully consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5) because they lack sufficient site areas for a balance of land uses, including enough site area for recreation and low-cost visitor guest accommodation, and as a result, they would also not provide enough equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access (project objective 1). The “Wilder” and “Wildest” alternatives would

also fail to meet project objective 5 because they would reduce the amount of area available for aquatic recreation uses, such as the enjoyment of open beach sand activities and boating.

Therefore, while all three of these alternatives would identify environmental uses, they would not consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5). These alternatives would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2) as the project would, and while these alternatives would provide bike and pedestrian pathways, they would not prioritize public access and connectivity to the extent that the project would or activation of the shoreline (project objective 6). The three ReWild alternatives would not enhance public access or provide equitable access to De Anza Cove because of how those plans laid out the habitat design to reduce access to the cove's shorelines compared to the project. Therefore, while these alternatives would meet project objectives 3 and 4 by incorporating climate adaptation strategies and embracing responsibility and stewardship of the environment, they would not meet most of the project objectives. Thus, they have been eliminated from further consideration. No changes to the PEIR are warranted.

Finally, this comment states that the comments contained in this letter address both the Amendment and PEIR, and requests that the City address these comments. The City is addressing the hundreds of comments on the PEIR received by various individuals and stakeholders, including the Wildlife Agencies, pursuant to the requirements of CEQA Guidelines Section 15088, which states that "the lead agency

shall provide a written proposed response, either in a printed copy or in an electronic format, to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report.”

- F1-6:** This comment provides support for an Amendment that meets the environmental goals of the Master Plan and Mission Bay Natural Resource Management Plan. Please see Appendix B of the PEIR for an analysis of the project’s consistency with the goals and objectives of the Mission Bay Park Master Plan (MBPMP), and PEIR Chapter 5.3: Biological Resources for mitigation measures designed to comply with the requirements of the Natural Resources Management Plan.

The project would include wetlands enhancement and restoration in City-owned portions of the existing KFMR/NWP, the area currently occupied by Campland, the eastern side of Rose Creek, and the areas in De Anza Cove currently occupied by the vacated mobile home park and open water. To the west of Rose Creek, the project seeks to implement the vision of the MBPMP by removing Campland and replacing it with habitat contiguous to the existing KFMR/NWP. The adopted MBPMP states, “West and south of Rose Creek inlet, and contiguous with the NWP, an 80+/- acre wetland habitat area is proposed.” The project allows for a total of 225.1 acres of expanded wetland habitat, approximately 86.8 acres of which would be located within the KFMR/NWP. Therefore, the project meets the environmental goals of the MBPMP, Multiple Species Conservation Program Subarea Plan (MSCP SAP), and Mission Bay Natural Resource Management Plan.

F1-6 cont.	<p>(Master Plan, Appendix I, Environmental Goal 2, p. 8). To fulfill this goal, the Master Plan specifically recommends establishing 80 acres of wetland at the outfall of Rose Creek and a potential upland habitat preserve on De Anza Point (Master Plan pp. 21, 33, 42, and 93). Northeast Mission Bay is currently the best location to establish extensive wetlands because it is located at the mouth of a creek and is contiguous with existing marsh. As stated in the Master Plan, “Mission Bay Park’s success or failure hinges on clean water,” and all measures that can “improve the vitality and health of the Bay waters should be explored and implemented as a priority” (Master Plan p. 84). The Master Plan states that the primary consideration for the De Anza Special Study Area is how it contributes to the Park’s water quality and that wetlands creation must be considered (Master Plan p. 53). The NRMP also supports an expansion of salt marsh within the 15-acre Campland lease area because “such an expansion would broaden the base for all of Mission Bay Park’s natural resources in the face of urban pressure and future threat of rising sea level” and identifies the expansion as a high priority (NRMP p. 43). The greater acreage of wetlands established at the mouth of Rose Creek, the better water quality for Mission Bay. A Feasibility Study found that construction of a 100-acre marsh at the mouth of Rose Creek could provide water quality benefits for average storm peak flows, while increasing the area of wetlands beyond the 100 acres would further benefit water quality (Master Plan, Appendix B-1). Study concepts in the Master Plan included creation of marsh on both sides of Rose Creek and within the De Anza Peninsula.</p>
F1-7	<p>The Service considers the ReWild Wildest Alternative, which was considered but eliminated in the PEIR without being fully analyzed, as an environmentally superior alternative that is consistent with the environmental goals of Master Plan. Therefore, consistent with our mission, we recommend it be adopted by the Master Plan.</p>
F1-8	<p>A complete analysis of the ReWild Wildest Alternative is available in the ReWild Feasibility Study and could be incorporated into the final PEIR with little additional analysis. The ReWild Feasibility Study received input from a Scientific and Technical Advisory Committee consisting of scientists, regulators, and City resource planners and managers, as well as the public, so the information contained in this study has been well-vetted and includes a level of analysis, such as the anticipated effects of sea level rise, that was not provided for the alternatives carried forward in the PEIR (see subheading: <u><i>Lack of Evaluation of Sea Level Rise</i></u>).</p>
F1-9	<p>Although the Service strongly supports inclusion of the ReWild Wildest Alternative in the PEIR and its selection as the environmentally superior alternative, the Wetland Optimized Alternative in the PEIR could also meet the goals of the Master Plan provided it can be demonstrated that impacts associated with the placement of fill within and adjacent to the Preserve are minimized (see subheading <u><i>Modifications to Avoid and Minimize Impacts to Habitat and Wildlife</i></u>) and modeling is conducted to demonstrate that more than 80 acres of low-, mid-, and high-elevation salt marsh and associated uplands will exist in 2100 in light of projected sea level rise.</p>
F1-10	<p>Both the Wetland Optimized and the ReWild Wildest Alternative would be consistent with our prior recommendations to maximize habitat restoration and restore contiguous habitat across the De Anza peninsula thus maximizing habitat for wildlife, benefiting water quality, and increasing carbon sequestration. They are also consistent with the Master Plan designation of Habitat Oriented</p>

The project would meet the environmental goals of the adopted MBPMP as explained above. While important, environmental goals are not the only goals that need to be met in order to comply with the MBPMP. The MBPMP calls for a “balanced approach” with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project presents a balanced plan that proposes 225.1 acres of expanded wetland habitat as well as 146.5 acres of the active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

F1-7: This comment reiterates support for the ReWild “Wildest” alternative and recommends the adoption of that alternative. Refer to response to comment F1-5. The PEIR identifies a reasonable range of alternatives pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6. PEIR Chapter 8.0, Alternatives, evaluates four alternatives that would reduce impacts compared to the proposed project (No Project/No Build Alternative, Wetlands Optimized Alternative, Enhanced Wetlands/Optimized Parkland Alternative, and Resiliency Optimized Alternative). The PEIR goes above the requirements of CEQA by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b). The

ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives are discussed in Section 8.2, Alternatives Considered and Eliminated. In terms of land use allocation, the ReWild “Wildest” Alternative does not propose adequate non-habitat land areas that meet the goals of the MBPMP and project objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. Therefore, the ReWild “Wildest” alternative was considered and eliminated from further consideration. No changes to the PEIR are warranted.

F1-8: This comment states a complete analysis of the ReWild “Wildest” alternative is available in the ReWild Feasibility Study and could be incorporated into the Final PEIR with little additional analysis, including an analysis on the potential effects of sea level rise. Refer to response to comment F1-5. A Sea Level Rise Assessment Technical Report has been prepared for the proposed project and Wetlands Optimized Alternative and has been incorporated in the Final PEIR. Further, the PEIR identifies a reasonable range of alternatives pursuant to CEQA Guidelines, Section 15126.6(a), and considered and eliminated the ReWild “Wildest” alternative in the PEIR. No changes to the PEIR are warranted.

F1-9: This comment states that the Wetlands Optimized Alternative in the PEIR could also meet the goals of the MBPMP provided it can be demonstrated that impacts associated with the placement of fill within and adjacent to the KFMR/NWP are minimized and modeling is conducted to demonstrate that more than 80 acres of low-, mid-, and high-

elevation salt marsh and associated uplands will exist in 2100 in light of projected sea level rise. A Sea Level Rise Assessment Technical Report has been completed and incorporated into the Final PEIR as Appendix N. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise scenario.

As discussed in PEIR Chapter 8.0, Alternatives, the Wetlands Optimized Alternative would meet the overall intent of the De Anza Cove area as it is currently envisioned in the MBPMP. The alternative would include amendments to refine the uses specific to the project area, allow for future athletic fields, retain regional parkland, add a potential water quality feature, add future lease opportunities for boat facilities, include upland/developed areas, and plan for expanded marshland/habitat. The Wetlands Optimized Alternative would similarly demolish Campland and implement wetland enhancement and restoration in City-owned portions of the existing KFMR/NWP, the area currently occupied by Campland, and the eastern side of Rose Creek. It would also convert the southern portion of the developed De Anza “boot” area and the open water portion of De Anza Cove to wetlands. The Wetlands Optimized Alternative would allow for a total of approximately 250.9 acres of expanded wetland habitat, approximately 86.8 acres of which would be located within the KFMR/NWP. In addition, the Wetlands Optimized Alternative would be designed to minimize the extent of construction activities within and adjacent to wetlands, including the number of

access routes and the size of staging areas. However, Section 8.3.2.3, Relationship to Project Objectives, of the PEIR concluded that the Wetlands Optimized Alternative would not meet project objectives 1 and 6 because, compared to the proposed project, it would not as fully provide equitable access or enhance the public access of De Anza Cove. The Wetlands Optimized Alternative would convert the southern portion of the developed De Anza “boot” and the De Anza Cove open water areas to wetlands. This would result in a reduction in low-cost visitor guest accommodations and open beach uses. Furthermore, the Wetlands Optimized Alternative would not fully implement project objective 5, as active and passive recreational uses would be further reduced, therefore also reducing the customer base and opportunities for passive and active recreation, compared to the proposed project.

F1-10: This comment reiterates that both the Wetland Optimized and the ReWild “Wildest” alternative would be consistent with the USFWS’s prior recommendations to maximize habitat restoration and restore contiguous habitat across the De Anza peninsula. Refer to response to comment F1-5 for a discussion of the PEIR’s consideration and elimination of the ReWild “Wildest” alternative. Chapter 8.0, Alternatives, provides an analysis of the Wetlands Optimized Alternative at an equal level of detail with the proposed project in accordance with the City’s awarded Supplemental Environmental Project (SEP) grant. The Wetlands Optimized Alternative would increase the acres of wetlands and associated transitional zones and uplands to be created and restored in Northeastern Mission Bay, converting the southern portion of the De Anza “boot” and open water areas of De Anza Cove to wetlands. The Wetlands Optimized

Alternative would maximize implementable wetland restoration generally reflective of existing feasibility studies for Mission Bay and would provide diverse beneficial uses, such as active recreation, regional parklands, open beach, low-cost visitor guest accommodations, boat facilities/clubhouse, uplands, multi-use paths, wetlands, and an Interpretive Nature Center. Section 8.3.2.3, Relationship to Project Objectives, of the PEIR concluded that the Wetlands Optimized Alternative would not meet project objectives 1 and 6 because, compared to the proposed project, it would not as fully provide equitable access or enhance the public access of De Anza Cove. The Wetlands Optimized Alternative would convert the southern portion of the developed De Anza "boot" and the De Anza Cove open water areas to wetlands. This would result in a reduction in low-cost visitor guest accommodations and open beach uses. Furthermore, the Wetlands Optimized Alternative would not fully implement project objective 5, as active and passive recreational uses would be further reduced, therefore also reducing the customer base and opportunities for passive and active recreation, compared to the proposed project. The proposed project also includes restoration of habitats used by sensitive, threatened, and listed avian species, as stated in the comment, and would expand habitat for nesting, roosting, and foraging.

F1-10 cont.	<p>Recreation Preservation, which is meant to support wetland (defined as a combination of mudflat, wetland, and uplands in the Master Plan) and upland habitats (Master Plan, p. 33), throughout the "foot" of the De Anza "boot" contiguous with the habitat to be restored at Campland. The federally and state listed endangered and fully protected light-footed Ridgway's (=clapper) rail [<i>Rallus obsoletus</i> (=longirostris) <i>levipes</i>; Ridgway's rail] and California least tern [<i>Sterna antillarum brownii</i> (<i>Sterna a. b.</i>); least tern], threatened western snowy plover [<i>Charadrius nivosus nivosus</i> (<i>C. alexandrinus n.</i>); snowy plover], and the state listed endangered Belding's savannah sparrow (<i>Passerculus sandwichensis beldingi</i>), as well as numerous migratory birds, use the Preserve and Mission Bay for nesting, and/or roosting, and foraging. Maximizing habitat will expand habitat for these sensitive avian species. Maximizing wetland restoration will also help improve the poor water quality conditions at De Anza Cove (Master Plan, Appendix B-3) and expand the amount of salt marsh, which is very effective at sequestering carbon that would otherwise contribute to climate change.</p>
F1-11	<p>Overall, the Service strongly recommends that the Amendment adopt an alternative that is consistent with the Master Plan and places development outside the peninsula and foot of De Anza Point because such development would fragment and introduce edge effects to existing and restored habitats. The land cover facilities associated with RV camping and Regional Parkland will also negatively affect water quality by introducing fertilizers, trash, lighting, and noise into the environment.</p>
F1-12	<p><i>Lack of Details Necessary to Assess Potential Biological Impacts and Benefits from the Project Alternatives</i></p> <p>The PEIR lacks details necessary to assess potential biological impacts and benefits from the alternatives. In addition, the PEIR defines habitats differently than the Master Plan, and the PEIR defines habitat differently for existing conditions and proposed conditions. The Master Plan identifies wetlands as a combination of mudflats, wetlands, and upland habitats. The PEIR provides a total acreage for existing wetland habitats that includes salt marsh, disturbed wetland, freshwater marsh, flood channel, marine habitat, eelgrass beds, and salt panne. Similarly, a total acreage is provided for existing upland habitats that include southern foredunes, Diegan coastal sage scrub, non-native grassland, disturbed, and developed. In contrast, the proposed habitat provided in the PEIR are in the following broader categories: total expanded marshland, which lumps together high-, mid-, low-[elevation] salt marsh areas, mudflats, and subtidal habitats; Preserve; total uplands, which lumps together dunes, sages, and buffer; open water; and beach. Because of the above, it is difficult to evaluate changes in habitat prior to and after implementation, and whether the alternatives meet the environmental goals of the Master Plan and NRMP.</p>
F1-13	<p>Based on review of the PEIR, the merits of each alternative with respect to wetland restoration remain unclear despite the acreage information summarized in Tables and Figures 3 through 3-4 showing anticipated uses in the Amendment area. Table S-1 through S-3 of the PEIR, for example, provide an overview of acreages allocated to various land uses, recreation, and restoration proposed in the vicinity of De Anza Cove, but do not quantify the types of wetlands (low-elevation, mid-elevation, and high-elevation salt marsh, mudflat) anticipated. This information is necessary</p>

F1-11: This comment reiterates the recommendation that the Amendment adopt an alternative that is consistent with the Master Plan and places development outside the peninsula and foot of De Anza Point because such development would fragment and introduce edge effects to existing and restored habitats. It also mentions that land cover facilities associated with RV camping and Regional Parkland will negatively affect water quality by introducing fertilizers, trash, lighting, and noise into the environment. Refer to response to comment F1-5 regarding the MBPMP goal for a "balanced approach" with three components: recreation, commerce, and environment. PEIR Section 5.3, Biological Resources, concludes that permanent edge effects could result during operation of the proposed project and may include intrusions by humans and domestic pets and therefore possible trampling of individual plants, invasion by exotic plant and wildlife species, exposure to urban pollutants (fertilizers, pesticides, herbicides, and other hazardous materials), soil erosion, litter, fire, and hydrologic changes (e.g., surface and groundwater level and quality). The project is required to comply with the MSCP SAP, the San Diego Regional Water Quality Control Board (RWQCB) Municipal Permit, the City's Stormwater Standards Manual, and National Pollution Discharge Elimination System (NPDES) regulations, through implementation of site design, source control, and incorporation of construction and permanent best management practices (BMP). Through complying with these regulations, potential edge effects would be adequately considered, addressed, and minimized.

F1-12: This comment states that the PEIR lacks details necessary to assess potential biological impacts and benefits from the

alternatives. As discussed in Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. The CEQA Guidelines contain guidance on when a PEIR may be prepared. As explained in the Draft PEIR, CEQA Guidelines, Section 15168, states that “A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) Geographically, (2) As logical parts in the chain of contemplated actions, (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.”

CEQA Guidelines, Section 15146, defines the degree of specificity necessary in an EIR: “The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.” Therefore, an EIR for a project, such as the adoption of a Master Plan Amendment, should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow. Therefore, the Draft PEIR does not serve as project-level environmental analysis for any specific development project and adequate information is not available at this time to address potential future site-specific impacts of the proposed project.

Furthermore, the Draft PEIR acknowledges that the City will evaluate future detailed General Development Plans (GDPs) for future projects as they are developed. A GDP, as defined in City Council Policy 600-33, is a Conceptual Master Plan that identifies the specific activities and amenities to be included within a park. As described in Section 1.2.2, Purpose and Intended Use of the PEIR, GDPs will be developed over time and will provide precise engineering and construction plans for the recreational elements of the proposed project. Since these plans are currently not available at the planning level, their environmental impacts have been estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements. Council Policy 600-33 also outlines the public participation process for the development of future GDPs. A public workshop is required to provide details of the project, including proposed scope, schedule, cost, and related information and would discuss the necessary steps for project review and approval. Once the project design has been completed, prior to approval, the City will route the future project through the Public Project Assessment process, which includes the preparation of the appropriate environmental documentation in accordance with CEQA. At that time, specific mitigation measures will be developed based the site-specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. At this point, public and agency comments will be invited to address the site-specific impacts identified in the future CEQA documentation. Therefore, the project and alternatives are adequately analyzed in the Draft PEIR in accordance with CEQA Guidelines, Section 15146. No revisions to the Draft PEIR are warranted.

The comment also states that the PEIR defines habitats differently than the Master Plan and that the PEIR defines habitat differently for existing conditions and proposed conditions. The habitat types are categorized consistent with the City's Biology Guidelines to determine potential impacts and associated mitigation ratios. No revisions to the PEIR are warranted.

F1-13: This comment states that the merits of each alternative with respect to wetland restoration remain unclear. The comment acknowledges that the PEIR provides wetlands acreage information in tables and figures, yet states that it should quantify the types of wetlands for both the proposed project and alternatives. Refer to response to comment F1-12 regarding the level of specificity required in an EIR pursuant to CEQA Guidelines, Section 15146. Further, a Sea Level Rise Assessment Technical Report has been completed and incorporated into the Final PEIR as Appendix N.

F1-13 cont.	to evaluate each alternative's "incorporation [of] climate adaptation strategies to increase resilience to climate change and mitigate sea level" (Project Objective #3; PEIR Section 3.2) and assess the extent to which the project "restor[es] and safeguard[s] natural habitats in De Anza Cove" (Project Objective #4; PEIR Section 3.2). Although restoration details are not available at the program level, an estimate of projected marsh zone acreages would facilitate an objective evaluation of project alternatives.
F1-14	The project description of the PEIR states that the project proposes enhancement and restoration of a total of 140.5 acres including a combination of mudflat, wetlands, and uplands habitats (Section 3.3.1.1) within the Preserve, including the area currently occupied by Campland. However, this acreage total conflicts with Table 3-2 Proposed Land Use Acreages of the Project Description (PEIR, p. 3-7) in which the Expanded Marshland/Habitat accounts for 140.5 acres comprised of 30.7 acres of expanded wetland in areas currently occupied by Campland and approximately 109.8 acres of new wetland but does not include the Preserve acreage. The Preserve acreage of 86.8 acres is reported separately (PEIR, Table 3-2). Open water accounts for 95.9 acres (PEIR, Table 3-2). Furthermore, the PEIR does not clearly explain which category—open water or wetland—accounts for eelgrass habitat. The final PEIR should clarify these acreages.
F1-15	As stated in our previous letters, to address these issues the PEIR should include tables and figures documenting the existing distribution and acreage of different habitat types (open water, mudflats, low-elevation salt marsh (cordgrass), mid- and high-elevation salt marsh, wetland-upland ecotone, dunes, coastal sage scrub, and maritime succulent scrub) and project elements (hardened shorelines, impervious surfaces for camping, RV camping areas, tent camping areas, camp amenities, parking, and circulation elements) and well as for immediately post-project implementation and with projected sea level rise in years 2050, 2075, and 2100. The final PEIR should also clarify how these habitat types relate to those in the Master Plan.
F1-16	The final PEIR should also clearly identify impacts from each project component (e.g., habitat restoration, hardened shorelines, impervious surfaces for camping, RV camping areas, tent camping areas, camp amenities, parking, and circulation elements). Overall, in light of the historic loss of wetlands and environmental goals of the Master Plan and NRMP, the Service recommends that impacts to wetlands or waters be limited to habitat restoration that is demonstrated to result in a net environmental benefit.
F1-17	<i>Lack of Evaluation of Sea Level Rise</i>
F1-18	The PEIR lacks an adequate evaluation of potential effects from projected sea level rise on the project alternatives. We note that the City's application to the California Regional Water Quality Control Board for the SEP specifies that the PEIR include an alternative that "would maximize implementable wetland restoration reflective of existing feasibility studies for Mission Bay and will provide diverse beneficial uses. This alternative would result in the establishment of 80 acres of additional functional wetlands (low-mid-high wetland/salt marsh and mudflats), in addition to the Kendall-Frost Marsh/Northern Wildlife Preserve, at the Year 2100" (City of San Diego, California Regional Water Quality Control Board San Diego Region Revised Project Application

F1-14: This comment states that a conflict exists between Section 3.3.1.1, Kendall-Frost Marsh Reserve/Northern Wildlife Preserve Area, and Table 3-2, Proposed Land Use Acreages of the Project Description. Following public review of the Draft PEIR, the project's land use acreages have been slightly modified. The project proposes 138.3 acres of expanded marshland habitat that includes approximately 33.9 acres currently occupied by Campland and approximately 104.4 acres of other new wetlands. In addition, the project would include restoration of marshland habitat within existing disturbed land and enhancement and hydrologic restoration activities in the 86.8-acre KFMR/NWP. The project also proposes 36.7 acres of upland habitat restoration located throughout the project area. These changes have been updated in Table 3-2 in the Final PEIR.

In addition, in response to the comment, the following revisions to PEIR Section 3.3.1.1, Kendall-Frost Marsh Reserve/Northern Wildlife Preserve Area, have been made to ensure consistency within the PEIR:

The project includes enhancement and restoration within the existing KFMR/NWP and the expansion of wetlands currently occupied by Campland; see Figure 3-1. The project would follow the MBPMP recommendation of replacing the existing Campland area with expanded marshland/habitat area, which would include a combination of mudflats, wetlands, and upland habitats. The total area would be approximately ~~140.5~~ 138.3 acres. The project would also maintain the existing University of California, San Diego, Biological Research Field Station facility located at the northwestern corner of

the KFMR/NWP, which allows for study and interpretation of the local environment, focusing on the estuarine and bay habitats of Mission Bay. ~~The project would also identify two alternative locations for a future environmental education and nature interpretation facility; in one of the alternative locations, it would be sited along Pacific Beach Drive within the KFMR/NWP. The facility would be above the marsh and buffered from the marsh.~~

F1-15: This comment states that the PEIR should include tables and figures documenting the existing distribution and acreage of different habitat types. As discussed in Chapter 2.0, Environmental Setting, wetland and upland vegetation communities (Tier I, II, IIIB, and IV) occurring in the project area are identified in Table 2-3, Wetland Vegetation Communities and Land Cover Types in the Project Area (Acres), and Table 2-4, Upland Vegetation Communities and Land Cover Types in the Project Area (Acres). These habitat types are from the City's Biology Guidelines. In addition, the comment states that the PEIR should include similar tables and figures for the immediately post-project implementation and with projected sea level rise in years 2050, 2075, and 2100. A Sea Level Rise Assessment Technical Report has been prepared for the proposed project and Wetlands Optimized Alternative and incorporated in the Final PEIR. This analysis includes a study of sea level rise projections in the year 2100 in accordance with the requirements of the SEP and is provided in the Final PEIR as Appendix N. Please refer to response to comment F1-12, which details the GDP process. The comment also states that the Final PEIR should clarify how the habitat types relate to those in the MBPMP. The habitat types in the PEIR are

consistent with the City's Biological Guidelines to determine potential impacts to resources and assign appropriate mitigation ratios.

F1-16: This comment states that the PEIR should clearly identify impacts from each project component. The USFWS also recommends impacts to wetlands or water be limited to habitat restoration that is demonstrated to result in a net environmental benefit. Section 5.3, Biological Resources, identifies potential direct impacts to sensitive vegetation communities and land cover types within each of the proposed project areas (KFMR/NWP; existing Campland; Mission Bay Tennis Center, Athletic Fields, and Golf Course; and De Anza Cove). However, as discussed in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. An analysis of the exact acreage of impacts that would occur to the sensitive vegetation communities in the project area as a result of the project is not provided at the programmatic level as such analysis would be speculative in nature as future site-specific projects are not known at this time. As future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the GDP process for the project and any impacts to sensitive vegetation communities would be avoided, minimized, or mitigated prior to the implementation of future site-specific projects; see response to comment F1-12 for more information. The proposed project includes habitat restoration that is anticipated to result in a net environmental benefit by providing over 225.1 acres of restored and managed wetland habitat. Refer to response to comment F1-5 regarding the MBPMP goal for a "balanced

approach” with three components: recreation, commerce, and environment. No revisions to the PEIR are warranted.

F1-17: This comment states that the PEIR lacks an adequate evaluation of potential effects from projected sea level rise on the project alternatives. A Sea Level Rise Assessment Technical Report has been prepared and incorporated into the Final PEIR as Appendix N. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise scenario.

F1-18: The comment states that the PEIR does not provide sufficient data on the distribution of habitat immediately post-project implementation and with sea level rise to confirm compliance with the SEP. A Sea Level Rise Assessment Technical Report containing such information has been prepared and incorporated into the Final PEIR as Appendix N. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise scenario.

F1-18
cont.

Form for Northeast Mission Bay Wetlands Restoration, dated June 25, 2020). The PEIR does not provide sufficient data on the distribution of habitat immediately post-project implementation and with sea level rise to confirm compliance with the SEP.

F1-19

As stated in our previous letters, the final PEIR should include an evaluation of the potential effects of sea level rise on the existing and proposed habitat areas for the project area and all of Mission Bay and the effects of human measures to address sea level rise. For this, the City could utilize the ReWild Feasibility Study as a model sea level rise analysis to be applied to the alternatives in the final PEIR. The ReWild Feasibility Study indicates that the distribution of existing wetlands will decline significantly with sea level rise and that little to no wetlands will exist in northeast Mission Bay by 2100 unless new wetlands are created. The City's *Our Climate Our Future Climate Resilience San Diego website* states "By 2100, San Diego could experience another 3.6 to 10.2 feet of sea level rise. Sea level rise will mean more flooding and faster rates of erosion along the coastline." This is further documented using the website's link to U.S. Geological Survey's *Our Coast, Our Future Hazard Map*, which illustrates existing wetlands and areas proposed for wetland restoration flooded with just 6.5 feet of sea level rise.

Need for Subsequent Public Review for Projects under the PEIR

F1-20

Given that the program level of the Amendment and PEIR precludes the analysis of project design details (i.e., wetland impact, restoration/creation/enhancement acreages, locations of recreational and water quality elements relative to habitat restoration), the PEIR analysis appropriately concludes in Table S-4 that direct or indirect impacts to sensitive vegetation communities, wetlands, and sensitive plant and wildlife species associated with these habitats would be potentially significant.

F1-21

The PEIR also states that "General Development Plans would be developed over time and provide precise engineering design and construction plans for the recreational elements included in the project. To ensure adequate environmental documentation and review upon the preparation of the General Development Plan, the Service requests, in addition to MM-BIO 5.3 1-5 (with revisions, provided below), that MM-BIO 5.3-6 (provided below) be added to the final PEIR mitigation monitoring and reporting program. MM-BIO 5.3-6 should require the preparation of a Biological Technical Report (BTR) that identifies project level impacts to biological resources and proposes mitigation in accordance with the City's Biology Guidelines for future project components, including both restoration and development components, proposed in the Amendment area. In addition, Wildlife Agency review and concurrence should be required prior to City approval of future project-level designs. As required by the Biology Guidelines, the BTR should also quantify acreages of existing and proposed impacts to sensitive habitats and species, including but not limited to uplands, wetlands, and eelgrass habitat, and including graphics and summary tables. The BTR would be subject to review and input Wildlife Agencies for deviations from the San Diego Municipal Code necessary for wetland impacts or reduction of the 100-foot buffer in the coastal zone.

F1-19: The comment requests that the Final PEIR include an evaluation of the potential effects of sea level rise on the existing and proposed habitat areas for the project area and all of Mission Bay and the effects of human measures to address sea level rise. The comment goes on to state that the City could use the ReWild Feasibility Study as a model sea level rise analysis to be applied to the alternatives in the Final PEIR. A Sea Level Rise Assessment Technical Report has been prepared and incorporated into the Final PEIR in accordance with the SEP as Appendix N. Conducting a sea level rise analysis of all of Mission Bay is outside the scope of this project and is not required by the SEP.

F1-20: The comment agrees with the PEIR's conclusion that direct or indirect impacts to sensitive vegetation communities, wetlands, and sensitive plant and wildlife species would be potentially significant. No further response is warranted.

F1-21: This comment recommends the inclusion of a new MM BIO 5.3-6 requiring the preparation of a Biological Resources Technical Report consistent with the City's Biology Guidelines. Preparation and submittal of a project-level Biological Resources Technical Report is a regulatory requirement pursuant to the City's Biology Guidelines and CEQA. The PEIR acknowledges that the City will evaluate future detailed GDPs as they are developed. Once future project design has been finalized, the City will prepare the appropriate environmental documentation in accordance with CEQA, including a Biological Resources Technical Report in accordance with the City's Biology Guidelines. It is acknowledged that future projects associated with impacts

Modifications to Avoid and Minimize Impacts to Habitat and Wildlife

F1-22	<p>The Service recommends minimal active restoration within existing intertidal wetlands, salt panne, and mudflats in and adjacent to the Preserve. This is the primary marsh and mudflat habitat in Mission Bay, and major impacts to it will negatively affect resident and migratory wildlife that depend on it. In addition, major disturbances to the marsh substrate will release the carbon sequestered therein. The salt marsh in the Preserve has been hydrologically degraded by fluvial freshwater being bypassed or directed away from the marsh. For example, Rose Creek used to enter the Preserve before it was channelized directly into Mission Bay. A ditch lower than the elevation of the marsh and along the east side of the Preserve sends freshwater flows directly into Mission Bay bypassing the salt marsh.</p>
F1-23	<p>Coastal salt marsh requires an appropriate amount of fluvial flows delivering freshwater, sediments, and nutrients into the marsh to be sustainable. For example, the input of sediment is needed to keep pace with sea level rise. In addition, lack of fluvial flows and associated delivery of freshwater and nutrients has been correlated with the reductions in the height of cordgrass (<i>Spartina foliosa</i>) thereby making them less supporting of nesting by Ridgway's rail. In the Preserve, artificial nest structures for Ridgway's rail are placed in the marsh because the cordgrass is too short to support nesting. To rectify this hydrological degradation, acceptable restoration activities within the Preserve may include reestablishment of a fluvial input from Rose Creek and other tributaries associated with the Noyes and Olney Street drains north of the Preserve, provided that the Service and California Department of Fish and Wildlife (collectively, the Wildlife Agencies) and the University of California Reserve (landowner) have the opportunity to provide input and final approval on the design and an associated hydrological analysis.</p>
F1-24	<p>The Service also recommends that the Amendment specify that fill only be placed in subtidal habitat for restoring subtidal habitat supportive of eelgrass (<i>Zostera marina</i>) or intertidal habitat (mudflats, low-elevation cordgrass marsh, mid- to high-elevation salt marsh). Figure 21 in the Amendment appears to show placement of dredge fill in the northeast side of De Anza Cove to create land. The Service does not support filling subtidal or intertidal habitat to create uplands because it would result in a net loss of wetlands. However, we may support filling of subtidal area to restore eelgrass or intertidal habitat (i.e., mudflat, low-, mid-, or high-elevation salt marsh) if it is shown to have a net environmental benefit to help make Mission Bay more resilient to sea level rise and reduce project costs associated with a net export of fill.</p>
F1-25	<p>We also recommend that the Amendment restrict fill from being placed immediately south of the Preserve in the existing mudflat and eelgrass beds because they are contiguous with a productive coastal salt marsh and thus currently part of a complete marsh system. If needed, fill could be placed in subtidal habitat immediately south of Campland, southwest of the De Anza Point peninsula, and in De Anza Cove.</p>
F1-26	<p>The Amendment should require measures to avoid and minimize indirect impacts to upland, wetland, and open water habitats in and around Mission Bay and Rose Creek including, but not limited to, indirect impacts associated with drainage from developed areas; toxins; lighting; noise; and invasive species. Measures to minimize indirect impacts to habitat areas would</p>

as a result of the GDP process would be subject to the Land Development Code Environmentally Sensitive Land Regulations Wetland Deviations and further input from the wildlife agencies would be necessary. The GDP process offers public engagement opportunities, and through this process, the wildlife agencies would be afforded an opportunity to provide input on future project level designs. No revisions to the PEIR are warranted.

F1-22: This comment recommends minimal active restoration within existing intertidal wetlands, salt panne, and mudflats in and adjacent to the preserve. The City appreciates this recommendation; however, it would be more appropriate to submit for consideration during future project-level review. This comment does not address the accuracy or adequacy of the PEIR. No further response is warranted.

F1-23: This comment recommends the reestablishment of a fluvial input from Rose Creek and other tributaries associated with the Noyes and Olney Street drains north of the KFMR/NWP. This comment does not address the accuracy or adequacy of the PEIR. The City appreciates the recommendation; however, it would be more appropriate to submit for consideration during the development of site-specific restoration plans associated with the project and as appropriate will give the wildlife agencies and the University of California Natural Reserve System (landowner) the opportunity to provide input on the design and an associated hydrological analysis through public engagement opportunities of the GDP process.

F1-24: This comment recommends that the Amendment specify that fill only be placed in subtidal habitat for restoring

subtidal habitat supportive of eelgrass or intertidal habitat. The City appreciates this recommendation; however, it would be more appropriate to submit for consideration during future project-level review. This comment does not address the accuracy or adequacy of the PEIR. No further response is warranted.

F1-25: This comment recommends that the Amendment restrict fill from being placed immediately south of the preserve. The City appreciates this recommendation; however, it would be more appropriate to submit for consideration during future project-level review. This comment does not address the accuracy or adequacy of the PEIR. No further response is warranted.

F1-26: This comment recommends that the Amendment require measures to avoid and minimize indirect impacts to upland, wetland, and open water habitats in and around Mission Bay and Rose Creek. Indirect impacts are analyzed in the PEIR Section 5.3, Biological Resources. Refer to response to comment F1-12. As future site-specific projects come forward, project-specific environmental analysis would be conducted in the review phase of the project, and any impacts to upland, wetland, and open water habitats would be avoided, minimized, or mitigated prior to the implementation of the future site-specific projects in accordance with the City's Biology Guidelines. No revisions to the PEIR are warranted.

F1-26
cont.

facilitate the maximum utilization by wildlife. For example, the Amendment, should require that all lighting be shielded and directed from the away from native habitats.

F1-27

While not included or evaluated in the PEIR, the Amendment allows the upper 50 feet of wetland buffers to include walkways, overlooks, picnic tables, benches, and lighting. However, according to the City's Biology Guidelines, wetland buffers in the Coastal Overlay Zone (COZ) must be limited to public access paths, fences, restoration and enhancement activities, and other improvements necessary to protect wetlands. While restoration/creation activities would be considered a compatible use in the COZ, overlooks, picnic tables, benches and undefined recreation improvements would be inconsistent with the existing Master Plan that specifically calls for expansion of habitat areas for sensitive species and adequate buffers to protect sensitive environmental resources from incompatible land uses (Master Plan, Appendix 1).

Therefore, the Amendment should specify that wetland buffers in the COZ must be limited to public access paths, fences, restoration and enhancement activities, and other improvements necessary to protect wetlands consistent with the City's Biology Guidelines.

Impacts to Federally Listed and/or SAP Covered Species

F1-28

Amendment activities could impact federally listed and/or SAP covered species and/or their habitats in the Preserve and Mission Bay. The federally listed endangered Ridgway's rail and least tern, and threatened snowy plover use the Preserve and Mission Bay for nesting, roosting, and/or foraging. We recommend that surveys be conducted to determine the number and distribution of listed/sensitive species within the Amendment area. The final PEIR and subsequent environmental documents should evaluate potential impacts and identify conservation measures to avoid and minimize impacts, to these species. Potential conservation measures are appended (Appendix) and should be included in the mitigation framework in the final PEIR and subsequent environmental documents. The Service is available to work with the City to further develop conservation measures for Amendment activities. If potential impacts to federally listed species cannot be avoided, consultation with the Service pursuant section 7 or 10 of the Act will be required. As a reminder, impacts to federally listed species within the U.S. Army Corps of Engineers (Corps) jurisdiction are not covered under the City's SAP.

F1-29

The Service recommends revisions to Section 5.3.2.1 of the PEIR which concludes that project impacts to covered species outside the City's MHPA would not be considered significant. The Service does not concur with this conclusion in the PEIR. According to the City's Biology Guidelines, "Certain species covered by the MSCP [see Section I of the Biology Guidelines] and other species not covered by the MSCP, may be considered significant on a case-by-case basis taking into consideration all pertinent information regarding distribution, rarity, and the level of habitat conservation afforded by the MSCP." Design measures to ensure compliance with the City's MSCP SAP and potential impacts to covered species should be evaluated on a case-by-case basis on the project level in the BTR required by MM BIO 5.3-6.

F1-27: This comment states that the Amendment allowing the upper 50 feet of wetland buffers to include walkways, overlooks, picnic tables, benches, and lighting is inconsistent with the existing Master Plan. As discussed in Section 5.3, Biological Resources, for development in the Coastal Overlay Zone (COZ), the City's Biology Guidelines require a 100-foot-wide avoidance buffer surrounding wetland resources to reduce indirect impacts and ensure the value and function of the wetland is maintained. Since large portions of the proposed project occur within wetlands and the project is confined by existing development in the surrounding area, impacts to the wetland buffers in these areas would be unavoidable and necessary reductions to the width of the wetland buffers would be determined in coordination with U.S. Army Corps of Engineers, RWQCB, California Department of Fish and Wildlife, and the USFWS prior to future site-specific project implementation, in accordance with the requirements in the City's Biology Guidelines. Although wetland buffers may be reduced in some areas, the proposed project would result in expansion and enhancement of wetlands in the De Anza Cove area and KFMR/NWP project component areas through establishment of mudflat and marshland habitat such that the proposed project would result in a net benefit to these habitats and associated wildlife species by providing an overall increase in wetland area following project implementation. In these locations, proposed restoration/creation activities would be considered a compatible use within COZ wetland buffers (i.e., restoration), in accordance with the allowed uses listed in Section 143.0130 of City's Land Development Code, Environmentally Sensitive Lands regulations. In addition, to the extent feasible, future projects would be designed to minimize construction activities within and adjacent to wetlands, including access

routes and staging areas. As a result, impacts to wetland buffers would be minimized to the maximum extent practicable and would be less than significant. No revisions to the PEIR are warranted.

F1-28: This comment recommends that surveys be conducted to determine the number and distribution of listed/sensitive species within the Amendment area. As discussed in Chapter 2.0, a total of 182 wildlife species, including 145 birds, 10 fish, 18 invertebrates, five mammals, and four reptiles, were observed during biological site visits. Species-specific surveys are not appropriate at the program level since site-specific construction and development activities are not available. As discussed in Section 5.3, Biological Resources, the project has the potential to directly impact 27 sensitive wildlife species, which were observed in the project area during surveys or were determined to have high potential to occur in the project area, including the Ridgway's rail, least tern, and threatened snowy plover. The MSCP SAP requires Area-Specific Management Directive (ASMD) for six of the nine sensitive wildlife species covered under the plan, including Belding's savannah sparrow, California least tern, Cooper's hawk, light-footed Ridgway's rail, northern harrier, and wandering skipper butterfly. PEIR Appendix D, Biological Resources Technical Report, Table 4, Proposed Project Consistency Determination with Multiple Species Conservation Program Subarea Plan General Management Directives and Area-Specific Management Directives, demonstrates the project's compliance with the MSCP SAP General Management Directives and ASMDs. ASMDs are not required for American peregrine falcon, California brown pelican, or reddish egret (City of San Diego 1997). Conformance with the MSCP SAP provides incidental take coverage for covered species such that impacts to those species would not be considered significant (due to

conservation of the species provided by MSCP SAP implementation). Further, implementation of ASMDs for applicable MSCP SAP covered sensitive wildlife species that occur in the project area would be required as a condition of project approval. Therefore, with implementation of the MSCP SAP and the species-specific ASMD as applicable, direct impacts to these nine sensitive wildlife species would be precluded and therefore determined less than significant. Potential direct impacts to the 17 sensitive wildlife species observed or determined to have California Endangered Species Act (CESA) would be mitigated in accordance with the City's Biology Guidelines. Direct impacts to vegetation communities used by wildlife would be conserved or restored through the implementation of MM BIO 5.3-3 through MM BIO 5.3-5, which require mitigation or revegetation for impacts to sensitive vegetation communities and jurisdictional aquatic resources.

In addition, this comment recommends that the Final PEIR and subsequent environmental documents evaluate potential impacts and identify conservation measures to avoid and minimize impacts to sensitive species. Refer to response to comment F1-12. As future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project, and any impacts to these sensitive wildlife species would be avoided, minimized, or mitigated prior to the implementation of the future site-specific projects. No revisions to the PEIR are warranted.

F1-29: This comment recommends revisions to Section 5.3.2.1 of the PEIR, which concludes that project impacts to covered species outside the City's Multi-Habitat Planning Area (MHPA) would not be considered significant. Refer to response to comment F1-12. As future site-specific projects come forward, project-

specific analysis would be conducted in the review phase of the project, and any impacts to these sensitive wildlife species would be avoided, minimized, or mitigated prior to the implementation of the future site-specific projects. In response to the comment, revisions to Sections 5.3.2.1 and 5.3.3.1 of the Final PEIR have also been made as follows:

Section 5.3.2.1

In general, conformance with the MSCP SAP provides incidental take coverage for covered species (both plants and wildlife) such that impacts to those species ~~outside the City's MHPA would not be considered significant (due to conservation of the species provided by MSCP SAP implementation).~~

Section 5.3.3.1

Conformance with the MSCP SAP provides incidental take coverage for covered species such that impacts to those species ~~outside the City's MHPA would not be considered significant (due to conservation of the species provided by MSCP SAP implementation).~~ Further, implementation of ASMDs for applicable MSCP SAP covered sensitive wildlife species that occur in the project area would be required as a condition of project approval in future site development permits, which would preclude impacts to the species at a project level. Therefore, with conformance with the MSCP SAP and the species-specific ASMD as applicable, direct impacts to these nine sensitive wildlife species are considered less than significant.

Planning and Implementing Habitat Restoration in Relation to New Development

F1-30

As stated in our previous letters, we recommend revising the Amendment to require the planning and implementation of habitat restoration prior to, or concurrent with, other project components (e.g., active recreation). There is an ecological, economic, and habitat-based public access benefit to coupling habitat restoration with other project components. If the planning and implementation of restoration is not completed prior to or concurrent with other project components, the potential for reducing restoration costs associated with removing infrastructure/asphalt and balancing cut and fill on site will be limited. In addition, the plan and funding for removing infrastructure and asphalt as well as restoring habitats west and east of Rose Creek should be completed and secured prior to operating new commercial or regional recreation.

Public Access

F1-31

We recommend that the Amendment incorporate language limiting public access in native habitats restored west of Rose Creek to that needed for habitat and wildlife management, and scientific research. In addition, the Interpretive Nature Center location west of Rose Creek should be removed. However, to help connect more people with nature and diversify the public's experiences in Mission Bay, habitats east of Rose Creek would be appropriate for passive recreation (e.g., trails and overlooks for hiking and bird watching), provided the Wildlife Agencies have the opportunity to review and approve the design.

Utilization of Native Vegetation for Landscaping

F1-32

We recommend that the Amendment require all vegetation on De Anza peninsula and the Regional Parklands within the Amendment area consist of appropriate native vegetation. Use of a native landscape palette for all landscaping will benefit wildlife and limit the cost of long-term irrigation (established native vegetation does not require regular irrigation) and minimize fertilizers from entering Mission Bay. It will also diversify the visitor experience by providing access to native vegetation and habitat.

Placement of Amenities for Camping

F1-33

We recommend that the Amendment require amenities for camping and RVs (e.g., concessions, dump stations, hook ups) be set back as far as possible from Mission Bay and habitat. Such design considerations are critical to minimize associated trash and pollutants from entering the bay and artificial night lighting, noise, and attraction of pests that can discourage wildlife (e.g., rats, crows, and gulls) from entering habitats. Only non-RV elements or camping restricted to tents or eco-friendly accommodations comprised of earth and native vegetation ground cover should be located within the peninsula to minimize edge effects associated with impervious surfaces and lights.

Storm Water or Water Quality Best Management Practices

F1-34

While the PEIR acknowledges the anticipated installation of water quality design features (PEIR, p. 3-5) and also states that "a key strategy is to locate wetlands as water quality improvement

F1-30: This comment recommends revising the Amendment to require the planning and implementation of habitat restoration prior to, or concurrent with, other project components (e.g., active recreation). This comment does not address the accuracy or adequacy of the PEIR. The recommendations identified in the comment would be more appropriate to submit for consideration during future project-level review.

F1-31: This comment recommends that the Amendment incorporate language limiting public access in native habitats restored west of Rose Creek and removal of the Interpretive Nature Center location west of Rose Creek. In response to this comment the City has removed the location of the Interpretive Nature Center west of rose creek. Section 3.3.1.1 Kendall-Frost Marsh Reserve/Northern Wildlife Preserve Area and Section 3.3.1.2 De Anza Cove Area d. Regional Parkland, Open Beach, Leased Areas, and Multi-Use Paths has been revised as follows:

Section 3.3.1.1 Kendall-Frost Marsh Reserve/Northern Wildlife Preserve Area

The project includes enhancement and restoration within the existing KFMR/NWP and the expansion of wetlands currently occupied by Campland; see Figure 3-1. The project would follow the MBPMP recommendation of replacing the existing Campland area with expanded marshland/habitat area, which would include a combination of mudflats, wetlands, and upland habitats. The total area would be approximately 138.3 ~~140.5~~ acres. The project would also maintain the existing University

of California, San Diego, Biological Research Field Station facility located at the northwestern corner of the KFMR/NWP, which allows for study and interpretation of the local environment, focusing on the estuarine and bay habitats of Mission Bay. ~~The project would also identify two alternative locations for a future environmental education and nature interpretation facility; in one of the alternative locations, it would be sited along Pacific Beach Drive within the KFMR/NWP. The facility would be above the marsh and buffered from the marsh.~~

Section 3.3.1.2 De Anza Cove Area

d. Regional Parkland, Open Beach, Leased Areas, and Multi-Use Paths

Regional parkland supports activities such as picnicking, kiteflying, Frisbee games, informal sports, walking, jogging, children's play, bicycling, and skating. The existing regional parkland would be enhanced with recreational amenities and access to the multi-use path that connects the project area to points to the north, west, and east. A sandy beach area at the northern and western edges of De Anza Cove would be adjacent to the low-cost visitor guest accommodation use and the boating use. The beach area would be protected by buffers/safety measures that would delineate the edges/extents of the non-motorized boat use. The multi-use path would be a feature for users to view the marshes and have distant views of Mission Bay.

Within the regional parkland areas, park amenities could include the multi-use path, “open green” areas, ~~one of the two alternative locations for a~~ future environmental education and Interpretive Nature Center, children’s play areas, surface parking, restrooms, and picnic shelters to support the recreational activities.

This comment does not address the accuracy or adequacy of the PEIR. The recommendations identified in the comment would be more appropriate to submit for consideration during future project-level review. No revisions to the PEIR are warranted.

F1-32: This comment recommends that the Amendment require appropriate native vegetation on De Anza peninsula and the regional parklands within the Amendment area. This comment does not address the accuracy or adequacy of the PEIR. The recommendations identified in the comment would be more appropriate to submit for consideration during the future GDP process for site-specific projects located in the De Anza peninsula and in areas designated as Regional Parkland. No revisions to the PEIR are warranted.

F1-33: This comment recommends that the Amendment require amenities for camping and RVs be set back as far as possible from Mission Bay and habitat. This comment does not address the accuracy or adequacy of the PEIR. The recommendations identified in the comment would be more appropriate to submit for consideration during the future GDP process for site-specific low-cost visitor accommodations. No revisions to the PEIR are warranted.

F1-34
cont.

features immediately adjacent to the existing storm drain outfalls...” (PEIR p. 3-4), it does not adequately describe storm water or water quality Best Management Practices (BMPs) to minimize water quality impacts from upland uses to existing and proposed wetlands. Considering that filtration of run-off would affect the health and function of existing or restored wetlands and BMPs could require maintenance that would also affect adjacent wetland areas, further detailed analysis is necessary.

The final PEIR should adequately describe storm water or water quality BMPs to minimize water quality impacts from upland uses to existing and proposed wetlands.

Living Shorelines

F1-35

The PEIR does not provide enough detail concerning the proposed living shorelines for an adequate evaluation of impacts. The Amendment identifies living shorelines as including oyster reef colonies, shoreline structures, and/or terraced access steps. National Marine Fisheries Service’s (NMFS) [Understanding Living Shorelines](#) indicates that living shorelines are utilized to stabilize shorelines, reduce erosion, and provide habitat to enhance coastal resilience. It also indicates that living shorelines exist in a spectrum of softer techniques, such as wetlands restoration, to harder techniques, such as bulkheads. In general, the Service does not support utilization of hard structures (e.g., bulkheads, rip rap, or cement) to protect shorelines if other alternatives are available and we suggest that the Master Plan restrict their utilization from all new development in or adjacent to wetlands, Mission Bay, and Rose Creek.

Future Impacts

F1-36

We are concerned that future uses and activities in Mission Bay, such as motorized watercraft and dredging, may impact the existing and proposed wetlands in the Amendment area and on Fiesta Island. The Service appreciates that motorized watercraft are restricted from De Anza Cove and that the proposed lease is non-motorized. However, we are concerned that motorized boats would have access to De Anza Cove. Motorized boats can pollute water and disturb wildlife and should be restricted from wetland areas. Further, motorized activity in the bay (e.g., jet skis, motor boats) would likely lead to rapid erosion of the wetlands based on known erosion rates at the Preserve. Future dredging could also lead to changes in hydrology, erosion, and long-term stability of existing and proposed wetlands.

The final PEIR should include requirements in the Mitigation and Monitoring Reporting Program to help ensure motorized boats do not access De Anza Cove (e.g., signage, procedures for enforcement of watercraft use) and future dredging does not impact existing or restored wetlands. Analysis of these issues should also be included in the project-level BTR described in MM BIO 5.3-6.

Inadequate Analysis of Indirect Impacts and SAP Compliance

F1-37

The PEIR provides inadequate analysis of indirect impacts to biological resources and SAP compliance. Sections 5.3.3.1, 5.3.3.2, and 5.3.3.3 of the PEIR conclude that indirect project impacts to plant and wildlife species, Tiers I through III habitats, and wetlands would be less

F1-34: This comment states that the Final PEIR should adequately describe stormwater or water quality BMPs to minimize water quality impacts from upland uses to existing and proposed wetlands. Refer to response to comment F1-12. As stated in Section 5.7, Hydrology and Water Quality, in accordance with the City’s Stormwater Standards Manual, the project is required to incorporate post-construction (or permanent) Low Impact Development site design, source control, and treatment control BMPs into future project design and would require the preparation of a Stormwater Quality Management Plan. The Stormwater Quality Management Plan must accompany the final design of subsequent project activities to ensure that runoff generated by the project is adequately captured/treated per applicable federal, state, and local regulations. No revisions to the PEIR are warranted.

F1-35: This comment states that the PEIR does not provide enough detail concerning the proposed living shorelines for an adequate evaluation of impacts. Chapter 3.0 states that “green” infrastructure would be implemented and provides oyster beds as one option where colonization is feasible. The City has committed to using the latest science and data, from agencies such as National Oceanic and Atmospheric Administration and the National Marine Fisheries Service, in the future to implement nature-based solutions. Refer to response to comment F1-12. Any potential impacts associated with green infrastructure would be identified consistent with the City’s GDP process for future site-specific projects. No revisions to the PEIR are warranted.

F1-36: This comment recommends that the PEIR include requirements to help ensure motorized boats do not access De Anza Cove and future dredging does not impact existing or

restored wetlands in the Mitigation and Monitoring Reporting Program. The City has taken this comment into consideration, and revisions to the Amendment have been made to clarify that channels accessing the cove are not intended to be used by large or motorized boats. Design in the GDP process would take into account potential operational noise impacts, and measures would be included to avoid and minimize potential impacts by dredging and motorized boat activity. No revisions to the PEIR are warranted.

F1-37: This comment states that the PEIR provides inadequate analysis of indirect impacts to biological resources and SAP Compliance. It also states that measures to protect the Ridgway's rail must be specific to address site conditions. The City agrees that Ridgway's rail must be protected and has modified the text in Table 4 of the Biological Resources Technical Report as follows:

The project and future site-specific projects would be required to conform with the MSCP SAP and ASMDs for covered species, including light-footed Ridgway's rail (MM BIO 2), which consider future site-specific project conditions. It is acknowledged that the Ridgway's rail is a fully protected species; therefore, specific measures would be included as conditions of project approval in future site development permits, which would preclude impacts to the species at a project level. Further, the project would be required to be in compliance with regulations protecting sensitive nesting birds and raptors, including the CFGC and MBTA.

F1-37 cont. than significant based on future compliance with elements of “the MSCP SAP, the San Diego RWQCB Municipal permit, the City’s Stormwater standards and NPDES regulations through site design, source control, and incorporation of construction and permanent BMPs.” The reader is referred to analysis of compliance provided in Tables 4 through 6 in Appendix D, the BTR. The following discussion provides examples of deficiencies in the analysis provided in those tables.

F1-38 Table 4 summarizes project compliance with MSCP General Management Directives and Area Specific Management Directives (ASMD). The ASMD for Ridgway’s rail, for example, states that if breeding season cannot be avoided, measures would be taken to reduce impacts to a level below significant. Given the fully-protected and endangered status of the Ridgway’s rail, measures must be specific to address site conditions. Table 4 of the BTR also states that fencing installed to prevent access to the Ridgway’s rail would be placed at the discretion of the senior park ranger. Project-level details pertaining to locations and acreages of wetlands and recreational uses are needed to adequately guide the placement of fencing for the protection of sensitive wetland resources, particularly given the endangered status of the species, and would require input with the Wildlife Agencies. Table 4 of the BTR also states that the Ridgway’s rail would be protected from additional edge effects from the creation of additional marshland. Again, this conclusionary statement does not ensure protection for the Ridgway’s rail from edge effects since no information has been provided on the location or type of marshland to be installed relative to the location of this species. Finally, MM BIO 5.3-2 is listed as a compliance measure that implements ASMDs for species listed in Table 4. A requirement for general monitoring without consideration given to a particular species or site conditions would not be considered an appropriate ASMD.

F1-41 Table 5 summarizes the project’s consistency with MSCP General Planning Policies and Design Guidelines and explains that “The project has been designed to follow existing disturbed and developed areas to the maximum extent practicable to avoid intrusion into the MHPA, where feasible” (BTR, Section 3.3). This statement is inconsistent with Section 5.3.3 of the PEIR that explains the limitations in program level analysis of direct impacts, “An analysis of the exact acreage of impacts that occur...in the project area as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site specific projects are not known at this time.” Similarly, at the programmatic level, project designs referenced in Table 5 are not available to support the conclusion that intrusions into the MHPA have been avoided to the maximum extent practicable.

F1-42 Table 6 states that MSCP Land Use Adjacency Guidelines related to drainage, lighting, and barriers will be ensured by the conversion of Campland to marshland. However, both the De Anza Natural and the Enhanced Wetlands/Optimized Parkland alternatives retain low-cost visitor accommodations on the De Anza Boot. As a result, drainage, lighting and need for barriers to restrict access will remain a concern where recreational uses are located adjacent to Multi-Habitat Planning Area (MHPA) as well as wetland areas outside the MHPA and would require analysis at the project level.

Due to the programmatic nature of the project, site-specific conditions that may affect the species are unknown at this time and would be speculative to address. As discussed in Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. As future site-specific projects come forward, project-specific analysis will be conducted in the GDP review phase of the project, and all impacts to sensitive wildlife species would be avoided, minimized, or mitigated prior to the implementation of future site-specific projects in accordance with the ASMD for Ridgway’s rail. The mitigation framework identified in the PEIR is adequate for the programmatic project level.

F1-38: This comment states that details regarding project-level fencing to prevent access to the Ridgway’s rail should be provided. Refer to responses to comments F1-12 and F1-37. The City concurs that project-level details pertaining to locations and acreages of wetlands and recreational uses are needed to guide the future placement of fencing for the protection of sensitive wetland resources, particularly given the endangered status of this species. At present time, no development is being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. Pursuant to the City’s Incidental Take Permit for the City’s Subarea Plan under the approved MSCP Section I, Special Restrictions Apply to Wetland Species, “incidental take of covered species due to mortality or habitat loss within U.S. Army Corps of Engineer’s jurisdictional wetlands is not authorized by this incidental take permit. Incidental take authorization for projects that affect such jurisdictional

wetlands shall be authorized through future Endangered Species Act Section 7 Consultations between the Service and the U.S. Army Corps of Engineers pursuant to section 404 of the Clean Water Act.” The City acknowledges the species associated with or dependent upon wetlands as stated in the Incidental Take Permit, such as Ridgway’s rail. As future site-specific projects are identified through the GDP process, it is anticipated that future consultation with the USFWS under Section 7 would be required. Conservation measures and design features such as fence placement would be implemented as identified at the project level. The mitigation framework identified in the PEIR is adequate for the programmatic project level. No revisions to the PEIR are warranted.

F1-39: This comment states that no information has been provided on the location or type of marshland to protect the Ridgway’s rail so the statement that the Ridgway’s rail would be protected from additional edge effects from the creation of additional marshland is conclusory. Refer to responses to comments F1-12, F1-36, and F1-37. As future site-specific projects come forward, project-specific analysis would be conducted in the GDP review phase of the project including potential edge effects. Indirect impacts to Ridgway’s rail would be avoided, minimized, or mitigated prior to the implementation of the future site-specific projects in accordance with the specific ASMD. The mitigation framework identified in the PEIR is adequate for the programmatic project level. No revisions to the PEIR are warranted.

F1-40: This comment states that a requirement for general monitoring as described in MM BIO 5.3-2 without

consideration given to a particular species or site conditions would not be considered an appropriate ASMD. Refer to responses to comments F1-12 and F1-36 through F1-38. Future projects would be required to comply with the Ridgway's rail-specific ASMD. This is consistent with the PEIR, which concluded that conformance with the MSCP SAP and the species-specific ASMD as applicable would reduce direct impacts to sensitive wildlife species including the Ridgway's rail. MM Bio 5.3-2 outlines the requirements of the qualified monitoring biologist for subsequent project-level approvals. The mitigation framework identified in the PEIR is adequate for the programmatic project level.

F1-41: This comment states that the conclusion in Table 5 of the Biological Resources Technical Report is inconsistent with the Section 5.3.3 of the PEIR. The information in the PEIR is correct. The following revisions to Table 5 of the Biological Resources Technical Report have been made to correct the inconsistency.

Table 5. Multiple Species Conservation Program Subarea Plan General Planning Policies and Design Guidelines Consistency Analysis

General Planning Policies and Design Guidelines Section 1.4.2 of the MSCP SAP		Analysis
Roads and Utilities – Construction and Maintenance Policies		
1	All proposed utility lines (e.g., sewer, water, etc.) should be designed to avoid or minimize intrusion into the MHPA. These facilities should be routed through developed or developing areas rather than the MHPA, where possible. If no other routing is feasible, then the lines should follow previously existing roads, easements, rights-of-way and disturbed areas, minimizing habitat fragmentation.	No development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. Future development consistent with the project has been will be designed to follow existing developed and disturbed areas to the maximum extent practicable to avoid intrusion into the MHPA, where feasible. Impacts would potentially occur within and directly adjacent to MHPA areas that would result in unauthorized intrusion into MHPA habitats. However, compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012a), and NPDES regulations and mitigation measures (MM BIO 2 and MM BIO 5) would be implemented to avoid any unauthorized intrusion and to reduce direct and indirect impacts to MHPA habitats. Therefore, the project would be in compliance with this MSCP SAP Planning Policy.

F1-42: This comment states that low-cost visitor accommodations would require analysis at the project level to address drainage, lighting, and need for barriers to restrict access to the adjacent MHPA. The City concurs with this comment. Refer to response to F1-12. As future site-specific low-cost visitor guest accommodation projects come forward, project-specific analysis would be conducted in the GDP review phase of the project including the review of drainage, lighting, and edge effect impacts. Impacts would be avoided, minimized, or mitigated prior to the implementation of the low-cost visitor guest accommodations in accordance with the MHPA Land Use Adjacency Guidelines. With required implementation of the MHPA Land Use Adjacency Guidelines, indirect impacts are considered less than significant; therefore, the conclusion in the PEIR is accurate. No revisions to the PEIR are warranted.

Once the project design has been finalized, the City will prepare the appropriate environmental documentation in accordance with CEQA, including a Biological Resources Technical Report in accordance with the City's Biology Guidelines. The project-level Biological Resources Technical Report would include measures consistent with the policies, directives, and guidelines of the SAP to avoid and minimize indirect impacts to those resources. The mitigation framework identified in the PEIR is adequate for the programmatic project level. No revisions to the PEIR are warranted.

F1-42
cont.

Thus, Tables 4 through 6 in the BTR and referenced in the PEIR provide inadequate analysis to support the conclusion of less than significant indirect impacts from the project.

The final PEIR should include additional information and analysis regarding indirect impacts to address the issues above. Analysis of these issues should also be included in the project-level BTR described in MM BIO 5.3-6. In addition, the project-level BTR should include measures consistent with the policies, directives, and guidelines of the SAP to avoid and minimize indirect impacts to those resources.

Modifications to Specific Mitigations Measures in the PEIR

The Service recommends revisions to the following mitigation measures provided in Table S-4 of the final PEIR:

F1-43

MM BIO 5.3-1 Focused Sensitive Plant Species Surveys. The Service recommends that revisions to this measure to include sensitive wildlife species and require the future refinement of these measures and development of additional project-specific measures as needed, based on the results of future surveys conducted in support of projects proposed within the Amendment area (see MM BIO 5.3-6). Potential occurrence of sensitive or state or federally listed species should be identified at the project level and mitigation methodology (e.g., relocation, if appropriate) should be determined at that time. Salvage, off-site relocation of sensitive species, or acquisition of mitigation credits would be considered appropriate mitigation only after impact avoidance has been demonstrated and other viable on-site mitigation options explored in coordination with the Wildlife Agencies.

Regarding the transplantation of federally endangered California seablite (*Suaeda californica*), the Service recommends project level verification of species as it is not known or expected to occur in San Diego County. Coordination with the Wildlife Agencies would be required for any proposal to utilize off-site populations for seed collection or translocation to habitat off-site.

F1-44

MM BIO 5.3-2 Qualified Monitoring Biologist. The Service recommends revisions to this measure to require the refinement of mitigation measures when project level design becomes available such that measures required for the protection of biological resources (including but not limited to avian protection and monitoring requirements) would be informed by the results of future project-level reconnaissance and focused surveys. Mitigation for sensitive species and habitats should be developed following project level analysis of proposed habitat restoration/creation, location and type of wetlands to be created, and potential and observed species occurrence at the time of those surveys. Conservation measures provided as the Appendix to this letter should be referenced in the development of project-specific mitigation measures.

F1-45

MM BIO 5.3-3. Sensitive Vegetation Communities and Jurisdictional Aquatic Resources Impacts Mitigation and 5.3-4 Eelgrass Beds Creation. The Service does not concur with the following proposed measure: "At least 1:1 creation mitigation for impacts to eelgrass must occur within Mission Bay (the remaining 1:1 mitigation may occur outside Mission Bay, if necessary)." Though eelgrass and wetlands must be distinguished in the Amendment and PEIR (see

F1-43: This comment recommends revisions to MM BIO 5.3-1, Focused Sensitive Plant Species Surveys, to include sensitive wildlife species. As discussed in Section 5.3, implementation of ASMDs for applicable MSCP SAP covered sensitive wildlife species that occur in the project area would be required as a condition of project approval. Therefore, with conformance with the MSCP SAP and the species-specific ASMD as applicable, direct impacts to these sensitive wildlife species are considered less than significant. In addition, the PEIR concluded that potential direct impacts to sensitive wildlife species observed or determined to have a high potential to occur that are not covered by the MSCP SAP or fully protected would be significant. Implementation of MM BIO 5.3-2 through MM BIO 5.3-5 would mitigate potential direct impacts to sensitive wildlife species and their habitats to below a level of significance through monitoring by a qualified biologist, providing mitigation ratios for acreage impacts and the creation and restoration of impacted vegetation communities. However, an analysis of the exact acreage of impacts that would occur to these sensitive wildlife species in the project area as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific projects are not known at this time. As future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project, and any impacts to these sensitive wildlife species would be avoided, minimized, or mitigated prior to the implementation of the future site-specific projects.

This comment also recommends that MM BIO 5.3-1 include language that the development of additional project-specific measures as needed would be based on the results of future

surveys conducted in support of projects proposed within the Amendment area. As discussed in Section 5.3, Biological Resources, as future site-specific projects come forward, project-specific analysis would be conducted in the GDP review phase of the project. This includes conducting appropriate focused surveys for wildlife species in accordance with the MSCP. Consistent with this comment, following project-level analysis, specific mitigation measures would be developed based on the site-specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. The project-level analysis would also include verification of the federally endangered California seablite (*Suaeda californica*). The mitigation framework identified in the PEIR is adequate for the programmatic project level. No revisions to the PEIR or MM BIO 5.3-1 are warranted.

F1-44: This comment recommends revisions to MM BIO 5.3-2, Qualified Monitoring Biologist, to address future projects that are developed as part of the Amendment. Refer to response to comment F1-42. The City confirms that mitigation measures would be identified when the project level design becomes available and would further protect biological resources. As discussed in Section 5.3, Biological Resources, as future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project. Consistent with this comment, following project-level analysis, specific mitigation measures would be developed based on the potential site-specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. The mitigation framework identified in the PEIR is adequate for the programmatic project level. No revisions to MM BIO 5.3-2 are warranted.

F1-45: This comment does not agree with the language in MM 5.3-4, Eelgrass Beds Creation, that allows the remaining 1:1 mitigation to occur outside Mission Bay. Consistent with the Mission Bay Natural Resource Management Plan and in response to the comment, MM BIO 5.3-4 in the PEIR and MM BIO-4 in the Biological Resources Technical Report have been revised as follows:

PEIR Section 5.3, Biological Resources

MM BIO 5.3-4 Eelgrass Beds Creation. Potential direct impacts to eelgrass beds caused by placement of fill material within Mission Bay shall be mitigated in accordance with the requirements of the resource agencies and the City of San Diego. The City of San Diego shall require a mitigation ratio of 2:1, in accordance with the City of San Diego's Municipal Code, Land Development Code—Biology Guidelines (see table in MM BIO 5.3-3). In addition, at a minimum, the no net loss creation mitigation (1:1) for eelgrass beds habitat shall be required to occur within Mission Bay itself per the Mission Bay Park Natural Resource Management Plan to the greatest extent feasible. ~~The remaining 1:1 mitigation required may occur outside Mission Bay, if necessary.~~

Appendix D, Biological Resources Technical Report

MM BIO-4 Eelgrass Beds Creation. Potential direct impacts to eelgrass beds caused by placement of fill material within Mission Bay shall be mitigated in

F1-45
cont.

subheading: *Unclear Acreages* above), for consistency with the City's Biology Guidelines Section III.b.1 that require mitigation for wetland impacts within the watershed, we recommend a revision to the PEIR to clarify that mitigation outside of Mission Bay would be permitted only following coordination with the Wildlife Agencies and a thorough investigation of wetland mitigation options in the immediate project vicinity. Generally, the Service recommends the selection of an alternative that would result in a net gain of wetlands such that all impacts resulting from the conversion of habitats would be mitigated through the creation or enhancement of habitat on-site. Furthermore, coordination with the NMFS would be required prior to project approval to obtain concurrence on proposed impacts to eelgrass beds as well as proposed mitigation to offset those impacts.

F1-46

MM-BIO 5.3-5 Habitat Restoration in Temporary Impact. The Service recommends revisions to this measure to reflect the City's Biology Guidelines that require mitigation for impacts at ratios provided in Tables 2a, 2b, and 3 with no distinction made between temporary and permanent impacts (City Biology Guidelines). All impacts are mitigated as permanent impacts. Accordingly, habitats restored for mitigation would require a 5-year rather than 25-month maintenance and monitoring period and in perpetuity long-term management plan required for wetland habitats restored for mitigation (City Biology Guidelines, Attachment B).

F1-47

MM BIO 5.3-6 Preparation of Biological Technical Report for Subsequent Projects Proposed in the Amendment Area.
In addition, the Service recommends the following mitigation measure (MM BIO 5.3-6 Preparation of Biological Technical Report for Subsequent Projects Proposed in the Amendment Area) be provided in Table S-4 of the final PEIR:

A BTR will be prepared in accordance with the City's Biology Guidelines and provided to the Resource Agencies for review and approval prior to any subsequent CEQA project review and/or City approval in the Amendment area. Preparation of the BTR should include, but not be limited to: results of focused and general surveys; evaluation of project compliance with the City's SAP and development of appropriate project design features to comply with SAP guidelines, directives, and conditions of species coverage; quantification (in acres) of existing habitat types [subtidal open water lacking eelgrass, subtidal open water occupied by eelgrass, intertidal and fluvial channels, mudflats, low-elevation salt marsh (cordgrass), mid- and high-elevation salt marsh, wetland-upland ecotone, dunes, coastal sage scrub and maritime succulent scrub]; determination of proposed conditions and anticipated habitat acreages, distinguishing habitat types as listed above, and created/enhanced/converted habitat; analysis of project specific indirect, direct, and cumulative impacts (acreages) on habitat types and associated species of concern; and development of project-specific mitigation measures. Additional guidance pertaining to MM BIO 5.3-6 and analyses required in the BTR provided in previous sections of this letter should also be used to develop this measure.

accordance with the requirements of the resource agencies and the City of San Diego. The City of San Diego shall require a mitigation ratio of 2:1, in accordance with the City of San Diego's Municipal Code, Land Development Code—Biology Guidelines (see table in MM BIO-3). In addition, at a minimum, the no net loss creation mitigation (1:1) for eelgrass beds habitat shall be required to occur within Mission Bay itself per the Mission Bay Park Natural Resource Management Plan to the greatest extent feasible. ~~The remaining 1:1 mitigation required may occur outside Mission Bay, if necessary.~~

F1-46: This comment recommends revisions to MM BIO 5.3-5, Habitat Restoration in Temporary Impact Areas. The City acknowledges that temporary impacts to wetland habitats are considered permanent and would be mitigated in accordance with Table 2-A or 2-B as appropriate. Therefore, MM BIO 5.3-5 in the PEIR and MM BIO-5 in the Biological Resources Technical Report have been revised to clarify that temporary impacts to uplands only shall apply. Pursuant to the City's Biology Guidelines, Section B-1, Development Area:

PEIR Section 5.3, Biological Resources

MM BIO 5.3-5 Upland Habitat Restoration in Temporary Impact Areas. Temporary direct impact to upland habitat areas shall be restored to pre-construction topographic contours and conditions, including the revegetation of native plant communities, where appropriate. Habitat restoration and erosion control treatments shall be installed within these short-term impact areas, in

accordance with the City of San Diego's Municipal Code, Land Development Code—Biology Guidelines, Multiple Species Conservation Program Subarea Plan, and the City of San Diego's Municipal Code, Land Development Code—Landscape Standards. Habitat revegetation shall feature native species that are typical of the area, and associated erosion control best management practices shall include silt fence and microplastic- and weed-free straw fiber rolls, where appropriate. The revegetation areas shall be monitored and maintained for 25 months to ensure adequate establishment and sustainability of the plantings/seedings.

Appendix D, Biological Resources Technical Report

MM BIO-5 Upland Habitat Restoration in Temporary Impact Areas. Temporary direct impact to upland habitat areas shall be restored to pre-construction topographic contours and conditions, including the revegetation of native plant communities, where appropriate. Habitat restoration and erosion control treatments shall be installed within these short-term impact areas, in accordance with the City of San Diego's Municipal Code, Land Development Code—Biology Guidelines, Multiple Species Conservation Program Subarea Plan, and the City of San Diego's Municipal Code, Land Development Code—Landscape Standards. Habitat revegetation shall feature native species that are typical of the area, and associated erosion control best management practices shall include silt fence

and microplastic- and weed-free straw fiber rolls, where appropriate. The revegetation areas shall be monitored and maintained for 25 months to ensure adequate establishment and sustainability of the plantings/seedings.

Appropriate revegetation and restoration will be completed as part of the future GDP in process in accordance with applicable regulations, including the City's Biology Guidelines. Therefore, MM BIO 5.3-5 implements the City's Biology Guidelines as stated above. No further revisions to the PEIR are warranted.

F1-47: This comment recommends that a new mitigation measure (MM BIO 5.3-6, Preparation of Biological Resources Technical Report for Subsequent Projects Proposed in the Amendment Area) be added to the PEIR. Pursuant to the requirements of CEQA, the City's Biology Guidelines, and the City's submittal requirements for discretionary permitting, preparation of a Biological Resources Technical Report for subsequent projects is required. As discussed in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. The PEIR acknowledges that the City will evaluate future detailed GDPs as they are developed. Once the project design has been finalized, the City will prepare the appropriate environmental documentation in accordance with CEQA, including a Biological Resources Technical Report in accordance with the City's Biology Guidelines, as applicable. No revisions to the PEIR are warranted.

Inclusion of the California Coastal Commission's Coastal Development Permit (CDP) for Fiesta Island in the Amendment

F1-48

We recommend that the Amendment be revised to incorporate the changes specified by the CDP for the Fiesta Island Amendment of the Master Plan [Addendum to Item TH9F, Coastal Commission Local Coastal Plan Amendment Application No. LCP-6-SAN-19-0142-2 (Fiesta Island), for the Commission Meeting of June 10, 2021]. The CDP changed the distribution of habitat and access within the Northern Subarea of Fiesta Island. These changes are not reflected in Figures 22 and 24 of the Amendment. Since the Master Plan is being amended again, we recommend that the City also incorporate the changes made through the CDP public review process for Fiesta Island. Changes to the Northern Subarea in the CDP included but were not limited to: relocation of the 30-acre California least tern nest site adjacent to the western beach, the closure of the nesting area to public access year round to protect the California least tern and other migratory birds and their habitat; the eastern half of the subarea being restored to tidal wetlands; replacement of the perimeter paved road with 1,600-foot long segment along the beach on the east side; and, prioritization of habitat improvements within the Northern Subarea over full redevelopment of the Southeast Subarea.

F1-49

We appreciate the opportunity to comment on the Amendment and PEIR to assist the City in realizing its vision for environmental stewardship consistent with the Master Plan, NRMP, and SAP. We are happy to work with you to address our comments on the Amendment and PEIR. If you have questions or comments regarding this letter, please contact [Carolyn Lieberman](#),² [Anita Eng](#),³ or [Sandy Vissman](#)⁴ at 760-431-9440.

Sincerely,

JONATHAN SNYDER
Digitally signed by JONATHAN SNYDER
Date: 2023.05.09 13:52:11 -0700
Jonathan D. Snyder
Assistant Field Supervisor

cc:

- PlanningCEQA@sandiego.gov
- Jordan Moore, City of San Diego
- Scott Sandel, City of San Diego
- Mayor Todd Gloria, City of San Diego
- Alexander Llerandi, California Coastal Commission
- Andrew Meyer, San Diego Audubon
- Megan Cooper, California Coastal Conservancy
- Isabelle Kay, University of California Reserve
- Chris Means, San Diego Regional Water Quality Control Board
- Jessie Lane, California Department of Fish and Wildlife

² Carolyn.Lieberman@fws.gov

³ Anita_eng@fws.gov

⁴ sandy_vissman@fws.gov

F1-48: This comment recommends that the Amendment be revised to incorporate the changes specified by the Coastal Development Permit for the Fiesta Island Amendment of the Master Plan [Addendum to the Coastal Commission Local Coastal Plan Amendment Application No. LCP-6-SAN-19-0142-2 (Fiesta Island), for the Commission Meeting of June 10, 2021]. The Amendment has already been updated to address the changes from the Fiesta Island Amendment of the Master Plan as adopted by City Council. This comment does not address the accuracy or adequacy of the PEIR. No further response is warranted.

F1-49: This comment includes the commenter's name, role, and contact information. This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is warranted.

APPENDIX

SUGGESTED CONSERVATION MEASURES

The following General and Species' specific conservation measures should be included in the mitigation framework in the final PEIR and subsequent environmental documents. The Service is available to work with the City to further develop conservation measures for Amendment activities.

General Conservation Measures (CM)

- CM 1. The City will temporarily fence (with silt barriers) the limits of project construction staging areas and access routes and mark (e.g., flag) the limits of dredging/excavation to prevent additional impacts and the spread of silt from the construction zone into adjacent avoided habitats. Fencing/marketing will be installed in a manner that does not impact avoided habitats. The City will submit to the Service for approval, at least 2 days prior to initiating project impacts, photographs that show the fenced/limited limits of impact. If work occurs beyond the fenced/limited limits of impact, all work will cease until the problem has been remedied to the satisfaction of the Service. Any riparian/wetland or upland habitat impacts that occur beyond the approved fenced area will be offset as determined by the Service. Temporary construction fencing/marketing will be removed upon project completion.
- CM 2. The City will implement the following conditions during project construction:
- a. Employees will strictly limit their activities, vehicles, equipment, and construction materials to the fenced project footprint.
 - b. To avoid attracting predators, the project site will be kept as clean of debris as possible. All food related trash items will be enclosed in sealed containers and regularly removed from the site.
 - c. Pets of project personnel will not be allowed on the project site.
 - d. Other than fill used to restore habitat, disposal or temporary placement of excess fill, brush, or other debris will not be allowed in waters of the United States or their banks.
 - e. All equipment maintenance, staging, and dispensing of fuel, oil, coolant, or any other such activities will occur in designated areas outside of waters of the United States within the fenced project impact limits. These designated areas will be located in previously compacted and disturbed areas to the maximum extent practicable in such a manner as to prevent any runoff from entering waters of the United States, and will be shown on the construction plans. Fueling of equipment will take place within existing paved areas greater than 100 feet from waters of the United States. Contractor equipment

F1-50: This comment is an attachment that includes a list of recommended conservation measures. The City appreciates these recommendations; however, they would be more appropriate to submit for consideration during future project-level review. No revisions to the PEIR are warranted.

F1-50

will be checked for leaks prior to operation and repaired as necessary.
"No-fueling zones" will be designated on construction plans.

- E. Impacts from fugitive dust will be avoided and minimized through watering and other appropriate measures.
- g. No work will occur at night.

Species Specific Conservation Measures

California Least Tern

- CM 3. In-water construction will occur from September 15 to March 31 to avoid the least tern nesting season.
- CM 4. If in-water construction must occur during the least tern nesting season (April 1 to September 15), the City will implement the following measures:
 - a. Beginning April 1, the City will have a least tern biologist to monitor daily for the arrival of least terns into Mission Bay, and immediately notify the Service upon their arrival. The City will coordinate with other least tern monitors in Mission Bay. The City will notify the Service via email on a daily basis as to the presence or absence of least terns in Mission Bay. The least tern biologist will be present throughout the period of in-water construction and will note the presence of least terns in Mission Bay and the work area.
 - b. The City will provide a biological monitor with least tern experience on all days when in-water work is conducted after least terns arrive in Mission Bay. The biological monitor will be present throughout the period of in-water construction and will note the presence of least terns in Mission Bay and the work area, and any project-generated surface turbidity. Surface turbidity is defined as an obvious discoloration of the top 10 feet of the water column visible to the human eye. Project-generated surface turbidity will not exceed 500 feet in length or width, or persist longer than 1 hour.
 - c. In the event surface turbidity exceeds 500 feet in length or width or persists longer than 1 hour, the biological monitor will be empowered to stop project activity to allow the plume to dissipate. The biological monitor will contact the City and Service immediately after construction has been stopped. Construction will not resume until approved by the City and the Service.
 - d. The biological monitor will provide daily field reports to the City and Service within 24 hours of each monitoring date. The daily field reports will include photographs showing the best management practices surrounding the work area taken during in-water work, and any incidences of plume escape or

F1-50
cont.

expansion outside of the silt curtain. The biological monitor will also submit a final summary report of monitoring to the City and Service within 30 days of completion of in-water work.

Light-Footed Ridgway's Rail

- CM 5. All work in or within 500 feet of marsh habitat will occur between September 16 and March 14 to avoid the Ridgway's rail nesting season.
- CM 6. The City will staff a biologist knowledgeable of Ridgway's rail biology and ecology (rail biologist) who will be responsible for overseeing compliance with conservation measures for the Ridgway's rail. The rail biologist will be approved by the Service. The City will submit the biologist's name, address, telephone number, and work schedule on the project to the Service at least 14 days prior to initiating project impacts. The rail biologist will perform the following duties:
- a. Perform a minimum of three focused pre-construction surveys, on separate days, to determine the presence of Ridgway's rails in the project impact footprint outside the rail breeding season. Surveys will begin a maximum of 7 days prior to performing project construction and one survey will be conducted the day immediately prior to performing project construction. The City will notify the Service at least 7 days prior to project construction to allow the Service to coordinate with the rail biologist on the surveys, and within 24 hours of detecting any Ridgway's rails in the project impact footprint.
 - b. Before each workday begins, check to see if Ridgway's rails have entered the project impact footprint.
 - c. Oversee installation of and inspect the exclusionary fencing required in CM 1 a minimum of once per day to help ensure any breaks in the fence are repaired immediately.
 - d. If any Ridgway's rails are found within the project impact footprint, the rail biologist will direct construction personnel to begin in an area away from the Ridgway's rails. In addition, the rail biologist will walk ahead of clearing/dredging equipment to flush birds towards channel areas to be avoided. It will be the responsibility of the rail biologist to ensure that Ridgway's rails will not be injured or killed by project implementation. The biologist will also record the number and location of Ridgway's rails disturbed by project construction.
 - e. Be on site during work to ensure compliance with all CMs.
 - f. Train all contractors and construction personnel on the biological resources associated with this project and ensure that training is implemented by construction personnel. At a minimum, training will include: (i) the purpose

F1-50
cont.

F1-50
cont.

- for resource protection; (ii) a description of the Ridgway's rail and its habitat; (iii) the CMs that should be implemented during project construction to avoid and/or minimize impacts to the Ridgway's rail and its habitat, including strictly limiting activities, vehicles, equipment, and construction materials to the project footprint to avoid sensitive resource areas in the field (i.e., access roads, and the construction/staging areas); (iv) environmentally responsible construction practices; and (v) the protocol to resolve conflicts that may arise at any time during the construction process.
- g. Halt work, if necessary, for any project activities that are not in compliance with the CMs. The rail biologist will report any non-compliance issues to the Service within 24 hours of its occurrence and confer with the Service to ensure the proper implementation of Ridgway's rail and habitat protection measures.
 - h. Submit weekly compliance reports (including photographs of impact areas) to the Service to show that authorized impacts were not exceeded and general compliance with all CMs. A separate report will be prepared and submitted to the Service immediately if an impact occurs outside of the approved project limits.
 - i. Submit a final report to the Service within 60 days of project completion that includes as-built construction drawings with an overlay of areas that were impacted or preserved and other relevant information documenting that authorized impacts were not exceeded and that general compliance with the CMs was achieved.

Comment Letter S1: California Department of Transportation, District 11, April 19, 2023

S1

From: [Dodson, Kimberly@DOT](mailto:Dodson_Kimberly@DOT)
To: [Moore, Jordan](mailto:Moore_Jordan)
Cc: State_Clearinghouse@dot.ca.gov; [Fabon, Maurice.A@DOT](mailto:Fabon_Maurice.A@DOT); [Aston, Shannon@DOT](mailto:Aston_Shannon@DOT)
Subject: [EXTERNAL] De Anza Natural DEIR SCH#2018061024
Date: Wednesday, April 19, 2023 4:33:39 PM
Attachments: [SD_5_22.87_De_Anza_Natural_DEIR_04-19-2023.pdf](#)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Jordan,

Please see the attached comment letter for the De Anza Natural DEIR SCH#2018061024.

Thank you,

Kimberly D. Dodson, GISP, M. Eng.
Associate Transportation Planner
Caltrans District 11 LDR Branch
4050 Taylor St., MS-240
San Diego, CA 92110
Kimberly.Dodson@dot.ca.gov
Telework phone: 619-985-1587

S1-1: This is a cover letter stating that the comment letter is attached. It does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

S1-1

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS 240
SAN DIEGO, CA 92110
(619) 709-5152 | FAX (619) 688-4299 TTY 711
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April 19, 2023

11-SD-5
PM 22.87
De Anza Natural
DEIR/SCH#2018061024

Ms. Jordan Moore
Senior Planner
City of San Diego
9485 Aero Drive
San Diego, CA 92123

Dear Ms. Moore:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the De Anza Natural located near Interstate 5 (I-5). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the City of San Diego in areas where the City and Caltrans have joint jurisdiction to improve the transportation network and connections between various modes of travel, with the goal of improving the experience of those who use the transportation system.

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S1-2: This comment discusses the California Department of Transportation's (Caltrans') mission, goals, and priorities. The City of San Diego (City) acknowledges Caltrans' participation in the review of the PEIR for the project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

S1-2

Caltrans has the following comments:

- Hydrology and Drainage Studies**
- S1-3 • There are four existing City drainage culverts that outlet into the cove. These existing culverts tie into Caltrans' drainage systems upstream. Please confirm if these drainage culverts are going to be modified and/or extended in the proposed project. Caltrans needs to know what the impacts are to state drainage systems that are connected to the City culverts that outlet into the cove.
 - S1-4 • Please provide the pre-project and post-project water surface elevations (high/low water tides). The project will impact the tailwater elevation on the four existing City drainage culverts that outlet into the cove. Caltrans need to know if there will be an increase in backwater within the drainage systems, including Caltrans' system.
 - S1-5 • The Hydrologic and Water Quality Study and Draft EIR make no reference to the State or the four City drainage systems that will be impacted by the proposed project.
 - S1-6 • Please provide grading and drainage plans when available. On all plans, show Caltrans' Right-of-Way (R/W).
 - Early coordination with Caltrans is recommended.
 - Caltrans generally does not allow development projects to impact hydraulics within the State R/W. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed.

- Complete Streets and Mobility Network**
- Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation network. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation network. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of San Diego is encouraged.
- To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the City to evaluate potential Complete Streets projects.
- S1-7
 - S1-8 • Bicycle, pedestrian, and public transit access during construction is important. Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies.

- Land Use and Smart Growth**
- Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe,

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S1-3: This comment asks if City drainage culverts in the project area that tie into Caltrans' drainage systems upstream would be modified and/or extended. As discussed in PEIR Chapter 3.0, Project Description, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. The PEIR acknowledges that the City will evaluate future detailed General Development Plans (GDPs) for future projects as they are developed. A GDP, as defined in City Council Policy 600-33, is a Conceptual Master Plan that identifies the activities and amenities to be included in a park. As described in PEIR Section 1.4.1, Type of PEIR, GDPs will be developed over time and will provide precise engineering and construction plans for the various elements of the project. Since these plans are currently not available at the planning level, their environmental impacts have been estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements. City Council Policy 600-33 also outlines the public participation process for the development of future GDPs. A public workshop is required to provide details of the project, including proposed scope, schedule, cost, and related information, and to discuss the necessary steps for project review and approval. Once the project design has been finalized and prior to approval, the City will route the project through the Public Project Assessment process, including the preparation of the appropriate environmental documentation in accordance with California Environmental Quality Act (CEQA). At that time, specific mitigation measures will be developed based on site-specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. The City also acknowledges that, due to lack of detail and site design in the PEIR, many future projects will undergo

site-specific CEQA review, which is the appropriate time to evaluate site-specific impacts.

When available, the requested documentation, including any modifications to drainage culverts that tie into Caltrans' drainage systems upstream, will be submitted to Caltrans for review. Therefore, the project is adequately analyzed in the PEIR, and no revisions to the PEIR are warranted.

S1-4: This comment requests that pre-project and post-project water surface elevations be provided to Caltrans for review. Please refer to response to comment S1-3. When available, the requested information, including potential increases in backwater in the drainage systems, will be submitted to Caltrans for review. No further response is warranted.

S1-5: This comment states that the Water Quality Study and PEIR make no reference to the four City culverts that would be impacted by the project. Please refer to response to comment S1-3. As discussed in Chapter 3.0, details of the utilities and infrastructure improvements will depend on the design details of future projects, which are not known at this time. Utilities are currently located in the project area and connect to the City's infrastructure. More specifically, stormwater drains and pipes in the project area connect to the City's infrastructure to the north. As described in PEIR Section 1.4.1 and in response to comment S1-3, GDPs will be developed over time and will provide precise engineering and construction plans for the recreational elements of the project. When available, the requested information, including modifications to drainage systems, will be submitted to Caltrans for review. No revisions to the PEIR are warranted.

S1-6: This comment requests grading and right-of-way drawings for the project. Please refer to responses to comments S1-3 and S1-4. The City will provide detailed plans as specific future projects are proposed. When available, the requested information will be submitted to Caltrans for review.

In addition, this comment recommends early coordination with Caltrans and states that Caltrans generally does not allow development projects to impact hydraulics within the state right-of-way. Please refer to response to comment S1-4. The City acknowledges Caltrans' stance on existing Caltrans' drainage facilities. When available, the requested information will be submitted to Caltrans for review. No revisions to the PEIR are warranted.

S1-7: This comment states that Caltrans supports enhancements that promote a complete and integrated transportation network and states that bicycle, pedestrian, and public transit access during construction should be maintained in accordance with Caltrans' goals and policies to reduce greenhouse gas emissions. As discussed in Section 5.10, Transportation and Circulation, the project would support and encourage the use of non-vehicular modes of transportation. The project would include multi-use pathways for pedestrians and bicyclists that would provide connections to existing public transit facilities. Improved pedestrian and bicycle infrastructure would be provided to connect on-site active recreation uses to the surrounding community and would enhance opportunities for residents to walk, bike, relax, and play. The improved pedestrian and bicycle facilities and parkland areas accessible for use by

nearby residents would reduce vehicle miles traveled and greenhouse gas emissions.

S1-8: This comment states that bicycle, pedestrian, and public transit access during construction is important. Future projects would be required to implement a Construction Traffic Control Plan to maintain necessary bicycle, pedestrian, and public transit access in the project area during construction. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is warranted.

S1-9: This comment states that Caltrans supports collaboration with local agencies to work toward a safe, functional, interconnected, multimodal transportation network integrated through applicable “smart growth” type land use planning and policies. As discussed in PEIR Section 5.10, Transportation and Circulation, the project would generate fewer trips compared to the current baseline condition. Therefore, the project would generally decrease the amount of vehicle traffic on the surrounding roadways and improve most intersection and roadway segment operations in the project area. Locations where project trips would increase the amount of traffic compared to

S1-9 cont. functional, interconnected, multi-modal transportation network integrated through applicable "smart growth" type land use planning and policies. The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

Traffic Control Plan/Hauling

S1-10 The California Department of Transportation (Caltrans) has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway network. Additional information is provided online at: <http://www.dot.ca.gov/trafficops/permits/index.html>

A Traffic Control Plan is to be submitted to Caltrans District 11, including the interchanges at I-5/Mission Bay Drive and I-5/Clairemont Drive, at least 30 days prior to the start of any construction. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during closures, including routes and signage.

Potential impacts to the highway facilities (I-5) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

Noise

S1-11 The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, the Department of Transportation (Caltrans) is not responsible for existing or future traffic noise impacts associated with the existing configuration of I-5.

Environmental

S1-12 Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W.

S1-13 An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

S1-14 We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W that includes impacts to the natural environment, infrastructure including but not limited to highways,

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current conditions are concentrated along roadway facilities fronting the key areas of the site's redevelopment. The PEIR concluded that the project's impact on an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle, and pedestrian facilities, would be less than significant, and no mitigation would be required, including improvements to intersections and interchanges. No revisions to the PEIR are warranted.

S1-10: This comment states that Caltrans' Transportation Permit Issuance Branch is responsible for issuance of specialty transportation permits for oversize/overweight vehicles on the State Highway Network and states that a Traffic Control Plan should be submitted to Caltrans. The City acknowledges that a Traffic Control Permit should be submitted to Caltrans District 11 prior to the start of construction of future projects if they would affect the interchanges along Interstate 5. Please refer to response to comment S1-3. No revisions to the PEIR are warranted.

S1-11: This comment states that Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of Interstate 5. The City notes this comment. PEIR Section 5.8, Noise, evaluated project-related traffic noise through comparison of the number of vehicle trips generated by the project relative to the existing baseline condition. As stated in the analysis, implementation of the project would result in a reduction in average daily traffic and peak-hour trips on weekdays and weekends, which would result in a decrease in traffic-related noise compared to the existing baseline conditions. Therefore, the project would not result in or

create a significant increase in existing ambient noise levels, and project-related traffic noise impacts would be less than significant. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. No further response is warranted.

- S1-12:** This comment states that Caltrans is a responsible agency and has discretionary authority over the portion of the project that falls within Caltrans' right-of-way. The City acknowledges Caltrans' role as a CEQA responsible agency should future projects impact Caltrans' right-of-way. Any proposed work within Caltrans' right-of-way will require discretionary review and approval by Caltrans. PEIR Chapter 1.0, Introduction, lists Caltrans as a responsible agency for the project. No revisions to the PEIR are warranted.
- S1-13:** The City acknowledges that an Encroachment Permit would be required for any work within the Caltrans' right-of-way. Please refer to responses to comments S1-3 and S1-12.
- S1-14:** This comment recommends that the project specifically identify and assess potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' right-of-way. This comment also requests any additional mitigation measures identified for the project. Please refer to response to comment S1-3. Caltrans will have the opportunity to comment on CEQA documents for future site-specific projects.

S1-14 cont. roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's draft Environmental Document.

Broadband

S1-15 Caltrans recognizes that teleworking and remote learning lessen the impacts of traffic on our roadways and surrounding communities. This reduces the amount of VMT and decreases the amount of greenhouse gas (GHG) emissions and other pollutants. The availability of affordable and reliable, high-speed broadband is a key component in supporting travel demand management and reaching the state's transportation and climate action goals.

Right-of-Way

- Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

S1-16 Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or emailing D11.Permits@dot.ca.gov or by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions or concerns, please contact Kimberly Dodson, LDR Coordinator, at (619) 985-1587 or by e-mail sent to Kimberly.Dodson@dot.ca.gov.

Sincerely,

Maurice A. Eaton

MAURICE EATON
Branch Chief
Local Development Review

"Provide a safe and reliable transportation network that serves all people and respects the environment"

S1-15: This comment provides Caltrans' recognition that teleworking and remote learning lessen the impacts of traffic on roadways and surrounding communities and that the availability of affordable and reliable, high-speed broadband is a key component in supporting travel demand management. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

S1-16: This comment discusses California Business and Profession Code, Section 8771; reiterates discretionary review for any work done within Caltrans' right-of-way; and provides contact information. The City acknowledges Caltrans' role should future projects impact Caltrans' right-of-way and the requirements of survey monuments per California Business and Profession Code, Section 8771. The project does not propose any specific development. The City agrees that any work performed within Caltrans' right-of-way will require discretionary review and approval by Caltrans. The Caltrans contacts are noted for future use.

In addition, this comment includes the commenter's name, role, and contact information. This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is warranted.

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Comment Letter S2: California Department of Fish and Wildlife, South Coast Region 5, April 20, 2023

S2

S2-1: This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

From: Ludovissy_Jenny@wildlife.ca.gov
To: moore_j@ca.gov
Cc: W.Lane@wildlife.ca.gov; Janner_Jessie@wildlife.ca.gov; Urewa_Karen@wildlife.ca.gov; OH.Smith@sanpablo.ca.gov; Arts_Eric@wildlife.ca.gov; Gower_Sarah@wildlife.ca.gov; Wasson_Rick@wildlife.ca.gov; Davis_Zach@wildlife.ca.gov; Ellis_Farrin@wildlife.ca.gov; Geyer_David@wildlife.ca.gov; Lane_Jessie@wildlife.ca.gov; Wasson_Rick@wildlife.ca.gov
Subject: [EXTERNAL] Copy of letter re: De Anza Natural Project
Date: Thursday, April 20, 2023, 2:44:14 PM
Attachments: [image001.png](#); [image002.png](#); [018831022-De-Anza-Natural-Project-Part-PEIR.pdf](#)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Ms. Moore,

S2-1 | Please see attached copy for your records. Questions and further coordination on terrestrial issues should be directed to Jessie Lane, Environmental Scientist, at Jessie.Lane@wildlife.ca.gov. Questions and further coordination on marine issues should be directed to Leslie Hart, Marine Environmental Scientist, at Leslie.Hart@wildlife.ca.gov.

Thank you,
Jenny

JENNY LUDOVISSY | Staff Services Analyst
She/Her/She/ers



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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



April 20, 2023

Jordan Moore
 Senior Environmental Planner
 City of San Diego
 9485 Aero Drive, MS 413
 San Diego, CA 92123
JTMoore@sandiego.gov

Subject: De Anza Natural (Project), Draft Program Environmental Impact Report (DPEIR), SCH #2018061024

Dear Ms. Moore:

S2-2

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a DPEIR from the City of San Diego (City) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹ CDFW previously submitted comments in response to the De Anza Revitalization Plan in 2016, the De Anza Cove Amendment to the Mission Bay Park Master Plan NOP in 2016, and the Notice of Preparation (NOP) of the DPEIR in 2022.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

S2-3

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on Projects and related activities that have the potential to adversely affect fish and wildlife resources. CDFW also oversees implementation of the Natural Community Conservation Planning (NCCP) program. The City of San Diego participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP) and Implementing Agreement (IA). The DPEIR for the proposed Project must ensure that all requirements and conditions of the SAP and IA are met. The DPEIR should also address any biological issues that are not addressed in the SAP and IA, such as specific impacts and

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The 'CEQA Guidelines' are found in Title 14 of the California Code of Regulations, commencing with section 15000.

S2-2: This comment thanks the City of San Diego (City) for the opportunity to comment on this project. The City appreciates the California Department Fish and Wildlife's (CDFW) participation in the review of the Draft PEIR. This comment introduces the comment letter and does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

S2-3: This comment summarizes the CDFW's role as a trustee agency, defines the CDFW's responsibility for marine biodiversity protection, and summarizes the role of the PEIR in analyzing potential biological issues and impacts. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft PEIR. Therefore, no further response is warranted.

S2-3
cont.

mitigation requirements for sensitive species that are not covered by the SAP and IA. CDFW is also responsible for marine biodiversity protection under the Marine Life Protection Act in coastal marine waters of California and ensuring fisheries are sustainably managed under the Marine Life Management Act.

S2-4

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 of seq.)

PROJECT DESCRIPTION SUMMARY

Proponent: City of San Diego (City)

Project Site Plan:



S2-5

Figure 3-1
Site Plan
The South Ballona (overlaid on the Mission Bay Park Coastal Plan)
(City of San Diego, De Anza Natural DPEIR, 2023)

S2-4: This comment summarizes the CDFW's role as a responsible agency under the California Environmental Quality Act (CEQA) and its regulatory authority as provided by the California Fish and Game Code. The City acknowledges this role and looks forward to future consultation with CDFW as future site-specific projects are identified through the General Development Plan (GDP) process. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft PEIR. Therefore, no further response is warranted.

S2-5: This comment provides a summary of the project description, project objectives, biological setting, marine biological setting, and alternatives described in the PEIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft PEIR. Therefore, no further response is warranted.

Objective: The purpose of the Project is to revitalize De Anza Cove in accordance with, and as an amendment to, the Mission Bay Park Master Plan (MBPMP). The MBPMP recommends that the revitalization should serve regional recreation needs including: providing guest housing; contributing to the improvement of the park's water quality; creating additional wetlands; facilitating hydrological improvements to support marsh areas; providing a waterfront trail, viewing areas, and other recreational features for public use; and ensuring leaseholds support the Mission Bay recreational use. The Project will update the MBPMP to ensure consistency with the Climate Resilient SD Plan and account for sea level rise and climate change.

Project objectives identified by the City are below:

1. Provide equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access.
2. Foster opportunities for members of local Tribal nations to reconnect to De Anza Cove.
3. Incorporate climate adaptation strategies to increase resilience to climate change and mitigate potential sea level rise impacts.
4. Embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats within De Anza Cove.
5. Diversify active and passive recreational uses that will serve a range of interests, ages, activity levels, incomes, and cultures both on land and in water.
6. Enhance public access and connectivity within De Anza Cove and increase connections to the surrounding communities, including opportunities for multimodal travel.

S2-5
cont.

Key project components are outlined below, and illustrated in Figure 3-1:

Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP)

The Project proposes to enhance and restore the existing 86.8-acre KFMR/NWP, which consists primarily of vegetated wetland. The Project will expand the Preserve through creation of 30.7 acres of new wetlands at the former Campland site. An additional 109.8 acres of wetlands will be created around De Anza Cove, on the eastern portion of the current De Anza 'boot,' and along the outfall of Rose Creek.

De Anza Cove Area – North

The northern region of the Project site will contain active recreational facilities such as tennis and pickleball courts, a clubhouse, and athletic fields. Many of the existing recreational uses will be retained; however, the Mission Bay Boat and Ski Club will be relocated. A shared clubhouse and boat facility will be constructed on the northern shore of De Anza Cove, for use by non-motorized boats. The DPEIR indicates that additional opportunities for expanded recreational uses will be analyzed under a General Development Plan in the future.

De Anza Cove Area – South

The existing RV campground and mobile home park will be partially replaced with low-cost visitor accommodations, which will be developed adjacent to the eastern bank of Rose Creek, as well as on the western portion of the De Anza 'boot.' The 48.5-acre low-cost visitor accommodations will provide space for RV's, cabins, or other 'eco-friendly' accommodations

and facilities consistent with camping. The existing regional parkland will be enhanced with recreational amenities, including access to the multi-use path that connects the Project area to surrounding paths. Other potential amenities include "open green" areas, children's play areas, parking lots, restrooms, and picnic shelters. A sandy beach area will run along the northern and western edges of De Anza Cove, adjacent to the low-cost visitor guest accommodation and boating use.

Environmental Education and Nature Interpretation Facility

A facility for environmental education and nature interpretation is proposed at one of two locations; one site is along Pacific Beach Drive within the KFMR/NWP, and the other site is along the northern shore of De Anza Cove, adjacent to the proposed boat facility and clubhouse.

Location: Mission Bay Park (Bay) is a 4,660-acre park within the City of San Diego. The 314-acre Project area is located in the northeast corner of Mission Bay and includes the following existing land uses: the KFMR/NWP, guest housing, athletic fields and tennis courts, a golf course, regional parkland, and the De Anza Cove Area, which is identified as the De Anza Special Study Area in the MBPMP. The KFMR/NWP area is partially within the Multi-Habitat Planning Area (MHPA) of the MSCP SAP.

Biological Setting: Mission Bay supports a wide variety of biological resources and habitats including diverse marine habitats, coastal salt marsh, and three terrestrial habitats: salt pan, coastal strand, and disturbed habitat (City, 1990). Mission Bay also hosts diverse avifauna, small mammals, reptiles, and habitat for avian feeding, resting, and breeding. The coastal salt marsh habitats improve the Bay's water quality through bioremediation and filtering of pollutants and wastewater discharge.

Special-status wildlife species observed in the Project area include: light-footed Ridgway's rail (*Rallus obsoletus levipes*; CESA- and federal Endangered Species Act (ESA)- listed endangered; California Fully Protected Species (FP)); Belding's savannah sparrow (*Passerculus sandwichensis beldingii*; CESA-listed endangered); American peregrine falcon (*Falco peregrinus anatum*; FP); California least tern (*Sterna antillarum browni*; CESA- and ESA-listed endangered, FP); black skimmer (*Rynchops niger*; California Species of Special Concern (SSC)); black tern (*Chlidonias niger*; SSC); brant (*Branta bernicla*; SSC); California brown pelican (*Pelecanus occidentalis californicus*; FP); Clark's marsh wren (*Cistothorus palustris clarkae*; SSC); common loon (*Gavia immer*; SSC); monarch butterfly (*Danaus plexippus*; ESA-candidate for listing); northern harrier (*Circus hudsonius*; SSC); redhead (*Aythya americana*; SSC); Southern California legless lizard (*Anniella stebbinsi*; SSC); and white-tailed kite (*Elanus leucurus*; FP). Two additional sensitive wildlife species were determined to have a high potential to occur in the Project area, but were not observed: northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*; SSC) and Mexican long-tongued bat (*Choeronycteris mexicana*; SSC). The Project area also contains suitable roosting and foraging habitat for additional common and sensitive bat species, including: hoary bat (*Lasiurus cinereus*), western red bat (*Lasiurus blossevillii*; SSC), western yellow bat (*Lasiurus xanthinus*; SSC), pallid bat (*Antrozous pallidus*; SSC), and western small-footed myotis (*Myotis ciliolabrum*).

Sensitive plants that were observed in the Project area include: Palmer's frankonia (*Frankenia palmeri*; California Rare Plant Rank (CRPR) 2B.1), San Diego marsh-elder (*Iva hayesiana*; CRPR 2B.2), southwestern spiny rush (*Juncus acutus* ssp. *leopoldii*; CRPR 4.2), and California

S2-5
cont.

seablite (*Suaeda californica*; ESA-listed Endangered; CRPR 1B.1). Two sensitive plant species were determined to have a high potential to occur in the Project area, but were not detected during biological resource surveys, including: estuary seablite (*Suaeda esteroe*; CRPR 1B.2) and Nuttall's acmispon (*Acmispon prostratus*; CRPR 1B.1).

Marine Biological Setting: Mission Bay is locally known for its bay, estuary, eelgrass, and shallow bay, important for fish and wildlife habitat. The Bay is also important nursery habitat for fish spawning, shelter, and foraging. The Bay includes large areas (i.e., 'beds') of eelgrass (*Zostera marina*, *Z. pacifica*), which is a sensitive marine habitat type and is important to many aquatic and nearshore species.

Alternatives Analysis: The four Project alternatives analyzed within the DPEIR include: 1) No Project/No Build Alternative; 2) Enhanced Wetlands/Optimized Parkland Alternative; 3) Resiliency Optimized Alternative; and 4) Wetlands Optimized Alternative. Excluding the No Project/No Build Alternative, the Enhanced Wetlands/Optimized Parkland Alternative was identified as the environmentally superior alternative in the DPEIR. Land uses proposed under each alternative by comparison to the Project are illustrated in the DPEIR Alternatives Analysis Figures and Tables Summary (Attachment A).

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

I. Specific Comments

COMMENT #1: CEQA Document Tiering

Issue: Site-specific design elements and associated impact-specific mitigation are not analyzed in high resolution within the DPEIR, due to the programmatic nature of the document. The City plans to provide more specific analysis under a General Development Plan (GDP) process that will be based on consistency with the PEIR; however, will not require circulation of additional CEQA documents. The GDP process as described will not benefit from further public review and analysis under CEQA.

Specific impact: The DPEIR indicates that several aspects of the Project will be analyzed during future site planning efforts as part of one or more GDPs through a public process. Specific aspects to be analyzed under a GDP include the recreational and athletic facilities, parking areas, layout of the proposed boat facility, site-specific wetland design, and construction of the Interpretive Nature Center. Per the DPEIR, the GDPs will provide precise plans for construction and engineering for the recreational elements of the project. The GDPs will be analyzed by the City for consistency with the PEIR, to determine if the mitigation is adequate, or if additional mitigation is required.

The DPEIR states, "If, when examining future development actions in the project area, the City finds no new environmental effects could occur or no new mitigation measures would be required other than those analyzed and/or required in this PEIR, the City can approve the activity without additional environmental documentation. If additional analysis is required, it

S2-6: This comment states that site-specific design elements and associated impact-specific mitigation are not analyzed in high resolution in the Draft PEIR due to the programmatic nature of the document. The comment recommends that the findings of significance should be set aside for aspects of the project that have not been fully analyzed.

As discussed in PEIR Chapter 3.0, Project Description, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. The CEQA Guidelines contain guidance on when a PEIR may be prepared. As explained in the PEIR, CEQA Guidelines, Section 15168, states that "A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) Geographically, (2) A logical parts in the chain of contemplated actions, (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

CEQA Guidelines, Section 15146, defines the degree of specificity necessary in an EIR: "The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." Therefore, an EIR for a project such as the adoption of a Master Plan Amendment should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow.

Therefore, the Draft PEIR does not serve as project-level environmental analysis for any specific development project and adequate information is not available at this time to address potential future site-specific impacts of the proposed project. The mitigation framework provided in the PEIR is adequate for program-level environmental review of the project and does not defer mitigation of biological impacts. The Draft PEIR acknowledges that the City will evaluate future detailed GDPs for future projects as they are developed. A GDP, as defined in City Council Policy 600-33, is a Conceptual Master Plan that identifies the activities and amenities to be included in a park. As described in PEIR Section 1.4.1, Type of PEIR, GDPs will be developed over time and will provide precise engineering and construction plans for the various elements of the project. Since these plans are currently not available at the planning level, their environmental impacts have been estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements. City Council Policy 600-33 also outlines the public participation process for the development of future GDPs. A public workshop is required to provide details of the project, including proposed scope, schedule, cost, and related information and would discuss the necessary steps for project review and approval. Once the project design has been finalized and prior to approval, the City will route the project through the Public Project Assessment process, including the preparation of the appropriate environmental documentation in accordance with CEQA. At that time, specific mitigation measures will be developed based on the site -specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. The City also acknowledges that, due to lack of detail and site design in the PEIR, many future projects will undergo

site-specific CEQA review, which is the appropriate time to evaluate site-specific impacts. CDFW will have the opportunity to comment on CEQA documents addressing future site-specific projects. Therefore, the project is adequately analyzed in the Draft PEIR, and no revisions to the Draft PEIR are warranted. Furthermore, additional findings of significance will be made based on subsequent or supplemental CEQA. In response to the comment Section 1.4.1 Type of EIRs has been revised as follows:

General Development Plans would be developed over time and provide precise engineering design and construction plans for the recreational elements included in the project. These plans are currently not available; however, their environmental impacts can be estimated at the program level, and a mitigation strategy would be developed that would apply to future improvements. When the General Development Plans are available for all or portions of the project area, the City will evaluate these detailed plans against this PEIR and determine if the analysis and mitigation is adequate or if additional analysis or mitigation is warranted. ~~If, when examining future development actions in the project area, the City finds no new environmental effects could occur or no new mitigation measures would be required other than those analyzed and/or required in this PEIR, the City can approve the activity without additional environmental documentation.~~ If additional analysis is required, it

can be streamlined by tiering from this PEIR pursuant to CEQA Guidelines, Sections 15152, 15153, and 15168 (e.g., through preparation of a Mitigated Negative Declaration, Addendum, or Supplemental or Subsequent EIR)" (PEIR, Section 1.4.1).

Why impact would occur: Site-specific analysis of biological impacts and specific mitigation for several aspects of the project is deferred. For instance, in the discussion of direct impacts to sensitive species and mitigation framework, the DPEIR states, "As future site-specific projects come forward, project-specific analysis would be required during the design and review phase of the project to ensure that any impacts to sensitive species are avoided, minimized, or mitigated as conditions of project approval prior to implementation" (DPEIR, Section 5.3.5.1.).

Additionally, in discussion of wetland impacts, the DPEIR states, "An analysis of the exact acreage of impacts that would occur to wetlands in the project area as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific projects are not known at this time. In addition, due to new, but unspecified development and associated infrastructure (e.g., lighting) occurring adjacent to wildlife habitat and the MHPA, CDFW is unable to consider, and provide thorough comments, to ensure that detrimental indirect edge effects would not occur to sensitive species and habitats protected under the City's SAP. As future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project, and any impacts to wetlands would be avoided, minimized, or mitigated as conditions of project approval prior to the implementation of the future site-specific projects" (DPEIR, Section 5.3.3.3.).

Absent specific details of impacts and mitigation for sensitive species and habitats, CDFW is unable to comment on the full breadth of environmental concerns and potential avoidance, minimization, or mitigation measures. While we appreciate additional public involvement through future site-specific GDPs, a PEIR-consistency approval process does not benefit from CEQA-level public review and analysis.

Evidence impact would be significant: CEQA Lead Agencies may elect to prepare a Program EIR as a high-level CEQA document addressing "...a series of actions that can be characterized as one large Project..." (CEQA Guidelines § 15168). Given the nature of a programmatic environmental document, CDFW acknowledges that the CEQA Lead Agency is not obligated to fully analyze subsequent activities for which insufficient data exists. However, CEQA findings of significance should only be made when those findings are supported by substantial evidence in the record (CEQA § 15091(b)).

Recommendation #1: We recommend that, for those aspects of the proposed Project that have not been fully studied, findings of significance should be set aside when certifying the PEIR until those aspects can be fully studied in a subsequent or supplemental CEQA document (see CEQA Guidelines §§ 15162 and 15163).

COMMENT #2: Wetland Design Elements and Habitat Classification

Issue: The DPEIR does not provide specific design elements of the proposed wetlands at the current Campland site, or around the De Anza Boot and De Anza Cove. Absent details

can be streamlined by tiering from this PEIR pursuant to CEQA Guidelines, Sections 15152, 15153, and 15168 (e.g., through preparation of a Mitigated Negative Declaration, Addendum, or Supplemental or Subsequent EIR).

S2-7: This comment states that the PEIR does not provide specific design elements of the proposed wetlands that will allow the CDFW to comment on the adequacy of the proposed habitat creation. The comment further recommends that the PEIR or subsequent CEQA document provide specific details of the habitat types in proposed wetlands and marshland creation areas. Refer to response to comment S2-6. As discussed in PEIR Chapter 3.0, no development is currently proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. As requested, subsequent CEQA documentation will provide specific details of the habitat types in the proposed wetland and marshland creation areas. Acreages for each habitat type, such as open water, mudflat, low saltmarsh, mid-high saltmarsh, transitional habitat, and upland habitat, will be identified. No revisions to the PEIR are warranted.

S2-6
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S2-7

of the wetland design elements, CDFW is unable to comment on the adequacy of the proposed habitat creation.

Specific impact: The proposed Project includes 227.4 acres of wetland habitat, comprised of 86.8 acres of existing habitat at the KFMR/NWP, 30.7 acres of new wetlands at the former Campland site, and 109.8 acres of other new wetlands (DPEIR, Figure 3-1). The DPEIR indicates that the Project will, "...follow the MBPMP recommendation of replacing the existing Campland area with expanded marshland/habitat area, which would include a combination of mudflats, wetlands, and upland habitats. This area would be approximately 140.5 acres" (DPEIR, Page 3-3). Expanded marshland and habitat will also be created in the De Anza Cove area, "...composed of high-, mid-, and low-salt marsh areas, mudflats, and subtidal areas..." (DPEIR, Page 3-3). Acreage totals for each habitat type and topographic details of the design are not included in the DPEIR.

Why Impact would occur: In the discussion of aquatic and wetland communities, the BTRR includes open water, tidal channel, and eelgrass beds in the wetland classification, citing the Wetland Mitigation Ratio table in the City of San Diego Biology Guidelines (City of San Diego 2018, Table 2A). Mitigation Measure BIO-4 further analyzes impacts to eelgrass beds, proposing 2:1 mitigation in accordance with the City's Bio Guidelines. It is not clear in the DPEIR if the eelgrass mitigation sites, open water, and tidal channels are included in the acreage calculations for expanded marshland and wetland creation. The Final PEIR or subsequent CEQA document should include a table that summarizes acreages of each habitat type to be included in the created wetlands and expanded marshland habitat; eelgrass mitigation and new open water areas should be calculated separately from wetland creation acreages.

Evidence impact would be significant: The Mission Bay Park Master Plan (MBPMP, 1994) indicates that an 80+- acre wetland habitat area is proposed west and south of the Rose Creek outfall, and contiguous with the Northern Wildlife Preserve.

Section 113.0103 of the San Diego Municipal Code defines wetlands as indicated below:

"Wetlands are defined as areas which are characterized by any of the following conditions:

1. All areas persistently or periodically containing naturally occurring wetland vegetation communities characteristically dominated by hydrophytic vegetation, including but not limited to salt marsh, brackish marsh, freshwater marsh, riparian forest, oak riparian forest, riparian woodlands, riparian scrub, and vernal pools;
2. Areas that have hydric soils or wetland hydrology and lack naturally occurring wetland vegetation communities because human activities have removed the historic wetland vegetation or catastrophic or recurring natural events or processes have acted to preclude the establishment of wetland vegetation as in the case of salt pannes and mudflats;
3. Areas lacking wetland vegetation communities, hydric soils and wetland hydrology due to non-permitted filling of previously existing wetlands;
4. Areas mapped as wetlands on Map No. C-713 as shown in Chapter 13, Article 2, Division 6 (Sensitive Coastal Overlay Zone)."

S2-7
cont.

S2-7
cont.

Recommendation #2: We recommend that the Final PEIR, or a subsequent CEQA document, provide specific details of the habitat types in the proposed wetland and marshland creation areas. Acreages for each habitat type such as open water, mudflat, low saltmarsh, mid-high saltmarsh, transitional habitat, and upland habitat should be identified. A summary table and detailed map should be included.

COMMENT #3: Climate Change Analysis

Issue: The DPEIR does not sufficiently incorporate climate resiliency into the Project design or include an analysis of how sea level rise will affect the proposed wetland habitat.

Specific impact: The DPEIR states, "the low-risk aversion projections for San Diego are 3.6 feet by the year 2100, and the medium-high risk projections are 7 feet by the year 2100... The project is a habitat restoration project with recreational amenities. Future planning efforts can consider phasing of adaptation strategies to account for uncertainty around timing and extent of sea level rise. With implementation of the project, De Anza Cove is expected to experience lowered levels of inundation and velocities by 2100 compared to if the area is left in its current state as a result of proposed wetland restoration activities, which would increase resilience to sea level rise and coastal flooding. Restored wetlands increase resilience by providing an increased opportunity for flood flows to be diverted into the new enhancement areas compared with existing impervious conditions" (DPEIR, Page 5.7-2). While the DPEIR discusses climate change in the context of tidal inundation resiliency for surrounding communities, it does not analyze how created wetland will be impacted by sea level rise.

S2-8

Why impact would occur: Several climate change models illustrate that areas of De Anza will be subject to sea level rise, which may jeopardize the redevelopment of De Anza, absent major structural infrastructure. The existing and proposed wetlands and buffer habitats in Mission Bay are at particularly high risk for impacts from sea level rise.

Sea level rise is expected to have significant impacts on wetlands, which provide critical habitat for a number of ESA- and CESA-listed species. Climate modeling shows that impacts of sea level rise will be particularly severe in areas with low-lying, flat terrain, which are vulnerable to inundation and erosion. To ensure the long-term resiliency of the newly created wetlands, it is essential to consider the specific habitat types that are necessary to support the ecological functioning of wetlands. These habitat types include marshes, mudflats, and shallow subtidal zones (Neckles et al., 2002). Marshes provide habitat for a variety of plant and animal species, including salt-tolerant vegetation and important food sources for birds and fish. Mudflats are important feeding and resting areas for shorebirds and other waterfowl, while shallow subtidal zones are important for shellfish, crabs, and other benthic organisms.

The Project design should aim to create resilient marsh habitats that can adapt to changing sea levels. In addition to ensuring that these habitat types are represented in Project design, it is critical to factor in the projected sea level rise for 2100, based on current climate modeling. It is important to design wetlands with transitional habitat, a buffer zone, and an elevation gradient that can accommodate sea level rise and maintain the essential habitat types.

S2-8: This comment states that the PEIR does not sufficiently incorporate climate resiliency into the project design or include an analysis of how sea level rise will affect the proposed wetland habitat. The project would expand the project area's natural habitat and improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect the City against the risk of climate change in line with the City's Climate Resilient SD Plan. A Sea Level Rise Assessment Technical Report has been prepared for the project and incorporated into the Final PEIR as Appendix N. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise scenario.

S2-8
cont.

Evidence impact would be significant: The City's Climate Change Vulnerability Assessment (City of San Diego, 2020) categorizes conservation areas/open space/source water land as having the highest vulnerability to sea level rise and storm surge. The assessment acknowledges the important habitat value and ecosystem services provided by City parks and natural areas, including climate control, flood prevention, nutrient cycling, and provisioning of clean air and water. In discussion of sea level rise, the Vulnerability Assessment states, "Conservation areas could experience damage or significant alteration if exposed to chronic flooding. The changes to ecosystems that come with sea level rise impacts—changes in sediment, nutrient availability, and salinity—could lead to shifts in habitat locations and may cause certain habitats to shrink or disappear (ICLEI, 2017). Species (including endangered species) may become locally extirpated if certain habitats in conservation areas and parks are lost (Consultation with City of San Diego Parks and Recreation Department, 2019)" (City of San Diego, 2020).

Recommendation #3: We recommend that the Project design include resilient marsh habitats that can adapt to changing sea levels. Transitional habitat, buffer zones, and climate-resilient elevation gradients should therefore be incorporated. The PEIR should include an analysis of habitat changes and adaptations over time in response to rising sea levels, projected out to 2100, based on current climate models. Additionally, the Project Alternatives should consider the effects of potential sea level rise and climate change on marine habitat modifications, created wetlands, and created upland habitat, based on climate modeling and the City's Climate Change Vulnerability Assessment. Analysis should include discussion of infrastructure and long-term maintenance, type conversion of habitats, and describe how the Project is congruent with the Climate Resilient SD Plan.

COMMENT #4: Wetlands Optimized Alternative Inadequacy

Issue: The Wetlands Optimized Alternative in the DPEIR does not demonstrate that 80-acres of wetland will remain after sea level rise in the year 2100.

Specific impact: The MBPMP identifies establishment of an 80-acre wetland area at the outfall of Rose Creek as a key environmental recommendation (MBPMP 1994). Funding was secured through a Supplemental Environmental Project (SEP) grant negotiated between the City and the Regional Water Quality Control Board (RWQCB; R9-2020-0150 SEP), for inclusion of an additional Project alternative which would expand habitat restoration opportunities. The SEP requires that the alternative, "...maximize implementable wetland restoration reflective of existing feasibility studies for Mission Bay..." (California Regional Water Quality Control Board, 2020). The SEP also requires that the alternative result in establishment of 80 acres of, "additional functional wetlands (low-mid-high wetland/salt marsh and mudflats), in addition to the Kendall-Frost Marsh/Northern Wildlife Preserve, at the Year 2100 based on current models utilized by the City for sea level rise projections" (California Regional Water Quality Control Board, 2020).

In accordance with the SEP requirements, the City incorporated and analyzed the Wetlands Optimized Alternative in the DPEIR. A table comparing the proposed land uses of the proposed Project versus the Wetlands Optimized Alternative is below, along with a Figure depicting the alternative:

S2-9

S2-9: This comments states that the Wetlands Optimized Alternative in the Draft PEIR should be analyzed to demonstrate that 80 acres of wetland would remain after sea level rise in the year 2100. In addition, this comment provides support for the Wetlands Optimized Alternative because it maximizes wetland restoration along the De Anza "boot." A Sea Level Rise Assessment Technical Report which demonstrates this has been prepared for the project and the Wetlands Optimized Alternative and is provided in the Final PEIR as Appendix N.

Land Use	Wetlands Optimized Alternative (acres)	Proposed Project (acres)
KFMR/NWP	86.8	86.8
Expanded Marshland Habitat	164.1 ¹	140.5
Upland Habitat (Dune, Sage) and Buffer Area	95.1	37.4
Low-Cost Visitor Guest Accommodations	27.4	48.5
Regional Parkland	30.8	26.3
Boat Facilities/Clubhouse	2.9	2.6
Interpretive Nature Center (1 Location) ²	—	—
Potential Water Lease ³	1.2	2.1
Active Recreation	49.9	60.1
Open Water	93	95.9
Open Beach	2.3	5.6
Road ⁴	1.9	1.6
Total	505.2	505.2

Notes: ¹KFMR/NWP - Kendall Frost Marsh Reserve/Nature Walks Preserve
²Expanded wetlands include 31.1 acres currently occupied by Concrete and 133 acres of other low wetlands.
³Area for the Interpretive Nature Center has not been determined, and programming for the center is assumed to occur after adoption of the amendment as part of a future GDP.
⁴Potential Water Lease areas on the plan are diagrammatic. The intent is to develop with Open Beach.
⁵Service roads, visitorway, access, and parking would be in areas zoned for recreation, visitor accommodations, regional parkland, and active recreation, subject to future design.



Why impact would occur: Although the Wetlands Optimized Alternative expands opportunities for wetland and upland creation, it does not incorporate climate modeling to illustrate how sea level rise will affect the created wetlands through the year 2100. Both the proposed Project and the Wetlands Optimized Alternative should include an analysis of how the created wetlands will change over time given current climate projections and demonstrate how 80 acres of functional wetlands would remain under projections through

S2-9
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2100. Transitional habitat should be incorporated, to allow for adaptation and habitat type conversion as sea levels rise.

Evidence impact would be significant: SEP funding required a detailed analysis of an expanded restoration alternative within the PEIR, to include projections to 2100 based on current climate models. Per the Revised Project Application, "The expanded restoration alternative would increase the acres of wetlands and associated transitional zones and uplands to be created and restored in Northeastern Mission Bay, converting the southern portion of the De Anza 'boot' and the De Anza Bay to wetlands. The expanded wetland alternative would maximize implementable wetland restoration reflective of existing feasibility studies for Mission Bay and will provide diverse beneficial uses. This alternative would result in the establishment of 80 acres of additional functional wetlands (low-mid-high wetland/salt marsh and mudflats), in addition to the Kendall-Frost Marsh/Northern Wildlife Preserve, at the Year 2100 based on current models utilized by the City for sea level rise projections" (California Regional Water Quality Control Board, 2020).

Recommendation #4: The Wetlands Optimized Alternative shall be further analyzed to demonstrate how 80 acres of additional functional wetland will remain in 2100, given sea level rise under current climate projections, to satisfy the requirements of the SEP funding. Additionally, to meet the SEP requirement to, "...maximize implementable wetland restoration reflective of existing feasibility studies for Mission Bay," the alternative should incorporate feasible design elements that were studied as a component of Audubon's ReWild Mission Bay. For instance, the ReWild Mission Bay Feasibility Study proposed three restoration alternatives ('Wild', 'Wilder', and 'Wildest'), which each incorporated subtidal, mudflat, low salt marsh, mid-high salt marsh, and transitional/upland habitat types, in addition to passive and active recreation areas with buffers. The habitat types were analyzed for sensitivity to sea level rise over time, projected to the year 2100 based on climate modeling.

We continue to encourage the City to incorporate native habitat along the entire De Anza peninsula. The marsh habitat associated with the Northern Wildlife Preserve (including the Kendall-Frost Reserve) serves an important regional resting, feeding, and migratory stop within the Pacific Flyway, and also acts as a significant bioremediation tool to improve water quality—a key focus of the MBPMP and the Mission Bay Natural Resources Management Plan (City of San Diego, 2002 and 1990 respectively). The City's planning documents have long recognized the mutual benefits that improved water quality offer public recreation and habitat values in specifically stating that the De Anza Special Study Area (SSA) "...shall not be developed to the detriment of existing and/or future adjacent habitat areas. Foremost in consideration should be the extent to which the SSA can contribute to the Park's [Mission Bay Park] water quality. In fact, additional wetlands creation *must be considered* [emphasis added] as part of the SSA." (City, 2002, p. 53). Given the range of alternatives analyzed in the DPEIR, CDFW supports the Wetlands Optimized Alternative, as it maximizes wetland restoration along the De Anza Boot.

COMMENT #5: Pile Driving and Sound Criteria

Issue: Project construction activities within the waters of Mission Bay could result in the generation of sound exposure levels (SELs) that may have a direct or indirect impact on marine species within the Project area.

S2-10: This comment states that pile driving activities could have direct impacts on marine species and recommends using a vibratory hammer for pile driving to the greatest extent feasible. If an impact hammer must be used, the comment provides additional minimization measures to be included in Mitigation Measure (MM) BIO 5.3-6. PEIR Section 5.3, Biological Resources, analyzes impacts from project construction activities within the waters of Mission Bay. Specifically, in Section 5.3.3.1, Issue 1: Sensitive Species, the PEIR concluded that project-related construction activities could result in the generation of sound exposure levels high enough to cause hydroacoustic effects on marine species, including marine fish, marine mammals, and green sea turtles, with potential to occur in the project area, which would result in a potentially significant indirect impact. MM BIO 5.3-6 requires that a Hydroacoustic Study be prepared prior to subsequent project-level approval and prior to any construction activities in the waters of Mission Bay to determine if the activities have potential to generate a sound exposure level exceeding the exposure level thresholds. This mitigation measure has been revised as follows to indicate that vibratory hammers for pile driving may be used; MM BIO-6 in the Biological Resources Technical Report (PEIR Appendix D) has also been revised:

MM BIO 5.3-6, Pre-Construction Hydroacoustic Study.

- b. To the extent feasible, a vibratory hammer shall be used for pile driving during construction. In addition, sound exposure level reduction measures shall be utilized during all work in Mission Bay with potential to generate hydroacoustic effects on marine resources.

S2-9
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S2-10

Specific Impact: Noise generated from impact pile driving may have adverse effects on marine mammals, fish, and other marine organisms from physiological and/or behavioral changes.

Why impact would occur: Projects that involve pile driving in or near water can contribute to increased underwater sound pressure levels in marine environments, resulting in potential impacts to marine species that range from alteration of behavior to physical injury or mortality. The pile type and size, depth of water, distance, substrate, and hammer size can all greatly influence the magnitude of potential impacts from underwater sound pressure on fish and other marine species. Additionally, fish and other marine species differ in regard to their sensitivity to underwater sound pressure. Some species are particularly sensitive to sound, possessing specialized structures and sensory systems to detect and use sound to direct their activities and respond adaptively to their environment. Smaller fish are generally more susceptible to physical injury from sound than larger fish; however, larger fish are generally more susceptible to temporary threshold shift than smaller fish. In 2008, the Fisheries Hydroacoustic Working Group determined that avoidance and minimization measures should be implemented to reduce impacts to marine species for any pile driving activity that has the potential to result in an underwater peak sound pressure level (SPL) that exceeds 206 dB.

Evidence impact would be significant: Mission Bay is inhabited by sensitive marine species that may be indirectly impacted by potentially significant high sound and vibration levels during the Project's construction activities. For assessing sound pressure wave impacts to fish from pile driving, CDFW relies on guidance from the Fisheries Hydroacoustic Working Group to set safe SPL criteria (FHWG 2008). The criteria include a peak SPL of 206 dB and a cumulative SEL level of 187 dB for fish two grams and heavier or a cumulative SEL of 183 dB for fish lighter than two grams. Additional information on in-water sound level criteria can be found at: <https://dot.ca.gov/programs/environmental-analysis/biology/hydroacoustics>.

Recommendation #5: CDFW recommends using a vibratory hammer for pile driving to the greatest extent feasible, or an alternative technology that produces the least amount of noise. If an impact hammer must be used (e.g., due to pile material, refusal at bedrock) as the Pre-Construction Hydroacoustic Study mitigation measure (MM BIO 5.3-6) proposes, multiple minimization measures are needed to reduce sound levels. CDFW recommends the following:

- A wood, or similar material, cushion block should be used between the pile and hammer during all pile driving using an impact hammer.
- To further reduce hydroacoustic impacts to fish and marine mammals, a bubble curtain should be used to the greatest extent feasible during all impact pile driving to reduce sound below levels that have been shown to cause injury and/or mortality.
- A sound attenuation and monitoring plan should be submitted to the resource agencies for review and approval prior to initiating pile driving activities.

These measures would include placing a nylon or wooden block between the impact hammer and piles during pile driving to reduce sound exposure level generated by the hammer strikes or “soft start” approaches to encourage marine species to leave the area surrounding work before full sound exposure level are generated.

The recommended minimization measures included in the comment letter would be more appropriate to submit for consideration during future project-level review. No further revisions to the PEIR are warranted.

S2-10
cont.

COMMENT #6: Sensitive Marine Fish and Invertebrate Species

Issue: Potential impacts to marine fish and invertebrate species, including both commercially and recreationally important species, were not identified in the Draft PEIR.

Specific Impact: In-water construction or wetland creation/restoration construction activities in Mission Bay may have a direct impact on many important commercial and recreational fish and invertebrate species that use the Project area for breeding, shelter, spawning, and foraging.

Why impact would occur: The Draft PEIR notes that there are potential direct impacts to eelgrass beds, a sensitive habitat type and important nursery habitat for fish species, resulting from the burial or excavations/dredging, placement of fill material, and pile driving within Mission Bay. Many fish and invertebrate species inhabit the eelgrass bed and open subtidal Mission Bay habitats within or adjacent to the proposed Project. These species and their habitats are vulnerable to direct and indirect dredging, excavation, fill, burial, turbidity, and sedimentation impacts.

Evidence impact would be significant: The Project's construction activities may have unavoidable impacts to existing sensitive marine fish and wildlife and associated marine habitats that are managed. For example, the placement of fill material from the proposed Project may displace marine fish such as the California halibut (*Paralichthys californicus*), which is an important recreational species in southern California and commercially-fished species among the state-managed fisheries.

Recommendation #6: CDFW recommends that potential impacts to marine fish and invertebrate species, including both commercially and recreationally important species, should be identified and analyzed in the Final PEIR. Any significant impacts to marine fish and invertebrate species should be disclosed in the Final PEIR and avoided and minimized to below a level of significance. A list and description of fish species in the Bay may be found on Marine Bios (<https://wildlife.ca.gov/Conservation/Marine/GIS/MarineBIOS>). Fish and invertebrate species which should be addressed include but are not limited to:

- California spiny lobster (*Panulirus interruptus*)
- California halibut (*Paralichthys californicus*)
- Leopard shark (*Triakis semifasciata*)
- Barred sand bass (*Paralabrax nebulifer*)
- Spotted sand bass (*Paralabrax maculatofasciatus*)
- Calico bass (*Paralabrax clathratus*)
- Black croaker (*Cheilotrema saturnum*)
- Yellowfin croaker (*Umbrina roncador*)
- Spotfin croaker (*Roncador stearnsii*)
- White croaker (*Genyonemus lineatus*)
- California corbina (*Menticirrhus undulatus*)
- Shovelnose guitarfish (*Rhinobatos productus*)
- Shortfin corvina (*Cynoscion parvipinnis*)

S2-11: This comment recommends that the PEIR identify potential impacts to marine fish and invertebrate species, including both commercially and recreationally important species, and provides a specific list of species. PEIR Section 5.3.3.1, Issue 1: Sensitive Species, has been updated to clarify that the project's direct and indirect impacts to sensitive species may include marine fish and invertebrate species that have the potential to occur in the project are as follows:

The A total of 27 sensitive wildlife species that were observed in the project area during surveys. Based on the literature and database review, an additional 15 sensitive wildlife species, including invertebrates, fish, reptiles, birds, and mammals, were considered for their potential to occur in the project area but were not observed during surveys. or were determined to have high potential to occur in the project area. The detailed evaluation of sensitive wildlife species potential to occur in the survey area is provided in Table 11, Sensitive Plant and Wildlife Species with Potential to Occur in the Project Area, in Appendix D.

The project has the potential to directly impact these sensitive species observed or determined to have a high potential to occur in the project area during construction activities and operation of the project through displacement of individual wildlife or elimination of portions of their habitat (Figure 5.3-1). In addition, some of the smaller sensitive species, such as reptiles and rodents, could be impacted killed or injured by clearing, grading, and other construction activities. Implementation of the

project would result in both permanent and temporary direct loss of habitat, including nesting, roosting, and foraging habitat, for the majority of the sensitive wildlife species observed or with a high potential to occur in the project. These sensitive wildlife species observed ~~or with high potential to occur~~ in the project area include the following: American peregrine falcon, Belding's savannah sparrow, black skimmer, black tern, brant, California brown pelican, California gull, California horned lark, California least tern, Caspian tern, Clark's marsh wren, common loon, Cooper's hawk, Costa's hummingbird, double-crested cormorant, elegant tern, light-footed Ridgway's rail, long-billed curlew, monarch butterfly, northern harrier, osprey, reddish egret, redhead, rufous hummingbird, Southern California legless lizard, wandering skipper, and white-tailed kite. Of the 27 sensitive wildlife species observed in the project area during surveys conducted in 2016 and 2018, six species, Belding's savannah sparrow, California brown pelican, California gull, osprey, double-crested cormorant, and monarch butterfly, were confirmed present during the 2022 biological surveys. In addition, two sensitive wildlife species, Mexican long-tongued bat and northwestern San Diego pocket mouse, were not observed but were determined to have a high potential to occur in the project area.

Refer to response to comment S2-6. As discussed in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not

currently available. Site-specific species surveys for marine fish and invertebrate species are not appropriate at the programmatic level. The mitigation framework provided in the PEIR is adequate for program-level environmental review of the project. Once future project-specific design has been finalized and prior to approval, the City would route the project through the Public Project Assessment process, including the preparation of the appropriate environmental documentation in accordance with CEQA. At that time, potential impacts to marine fish and invertebrate species would be identified, species-specific surveys may be conducted, and mitigation measures would be developed based the site-specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. No additional revisions to the PEIR are warranted.

II. Mitigation Measure and Related Impact Shortcoming

COMMENT #7: Mitigation Measure BIO 5.3-1 (MM BIO 5.3-1), Sensitive Plants

Section 5.3.5, Page 5.3-20

Issue: The DPEIR does not provide sufficient evidence to support the feasibility of the proposed mitigation for sensitive plant species in MM BIO 5.3-1.

Specific impact: Three sensitive plant species have been observed or determined to have a high potential to occur within the Project area: Palmer's frankenia (CRPR 2B.1), San Diego marsh-elder (CRPR 2B.2), and California seablite (ESA-listed Endangered; 1B.1).

The DPEIR proposes MM BIO 5.3-1 to reduce potential direct impacts to the species to less than significant. The measure includes focused sensitive plant surveys in suitable habitat for California seablite, Palmer's frankenia, and estuary seablite, prior to site-specific Project approval. Direct impacts to sensitive plant species will be avoided where feasible. However, the DPEIR states:

"If significant impacts to these species are unavoidable, the take of these species shall be reduced to a less than significant level through implementation of one or a combination of the following actions: in accordance with a City of San Diego approved Conceptual Restoration Plan or acquisition of mitigation credits:

- Impacted plants shall be salvaged and relocated to suitable habitat in the on-site restoration area in Kendall-Frost Marsh Reserve/Northern Wildlife Preserve within the Multi-Habitat Planning Area boundary, if possible. If relocation to this site is not practical, the plants shall be relocated off-site to an appropriate (nearby) location determined by a qualified biologist.
- Seeds from impacted plants shall be collected for use at a local off-site location.
- Off-site habitat that supports the species impacted shall be enhanced and/or supplemented with seed collected on site.
- Comparable habitat at an approved off-site location shall be determined by a qualified biologist and preserved for relocation, enhancement, or transplant of the impacted sensitive plants.

Mitigation that involves relocation, enhancement, or transplant of sensitive plants shall include all of the following:

- Conceptual planting plan prepared by a qualified biologist including grading and, if appropriate, temporary irrigation;
- Planting specifications and fencing and signage to discourage unauthorized access of the planting site;
- Monitoring program including success criteria; and
- Long-term maintenance and preservation plan'

Translocation plans should be provided to CDFW for review and comment, and for concurrence on the success criteria and remedial measures in the event the restoration is not successful.

S2-12

S2-12: This comment states that the PEIR does not provide sufficient evidence to support the feasibility of the proposed mitigation for sensitive plant species in MM BIO 5.3-1. Refer to response to comment S2-6. As discussed in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. The mitigation framework provided in the PEIR is adequate for program-level environmental review of the project. As discussed in PEIR Section 5.3, as future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project. At that time, specific mitigation measures would be developed based on the site-specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. No revisions to the PEIR are warranted.

In addition, this comment provides recommended additions to MM BIO 5.3-1. As stated in MM BIO 3.5-1, mitigation that involves relocation, enhancement, or transplant of sensitive plants shall include a conceptual planting plan and long-term maintenance and preservation plan. As discussed in PEIR Section 5.3, as future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project, and any impacts would be avoided, minimized, or mitigated prior to implementation of future site-specific projects. Project-specific plans would be prepared in accordance with the City's Biology Guidelines, Attachment B. The recommendations identified in the comment would be more appropriate to submit for consideration during future project-level review. No revisions to the PEIR are warranted.

S2-12
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CDFW generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to species, as studies have shown that these efforts are experimental in nature and largely unsuccessful. Should the City pursue these methods as mitigation for sensitive plant species, the final PEIR should provide strong evidence to demonstrate the feasibility of the proposed mitigation.

Why impact would occur: Transplantation has been shown to have limited success in establishing rare plants at new locations. A study by CDFW (Fiedler, 1991) found that, even under optimal conditions, transplantation was effective in only 15% of cases studied. Other reviews (e.g. Allen, 1994; Howald, 1996) identified similar issues: digging up, transporting, and replanting plants, bulbs, rhizomes, or seeds imposes stress on plants, which can lead to mortality; scientifically tested, reliable methods for salvage, propagation, translocation, or transplantation are not available for many rare species; areas where the impacted taxon is already present are often at the carrying capacity for the habitat, and introduction of transplanted individuals will disrupt the equilibrium of the population and will not increase the vitality of the taxon.

Evidence impact would be significant: As indicated in the DPEIR and per the City of San Diego Biology Guidelines, direct impacts to non MSCP-covered federal- and/or state-listed plant species, non MSCP-covered CRPR 1B.1, 1B.2, or 2B.2 species, or covered species in the MHPA are considered significant. Mitigation measures included in the PEIR must be both feasible and enforceable (CEQA Guidelines § 15126.4). Absent sufficient mitigation, impacts to California seablite would also be considered significant pursuant to the federal Endangered Species Act.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Project Description and Related Impact Shortcoming)

Mitigation Measure #1: To reduce impacts, the final PEIR shall provide evidence (e.g. scientific literature, monitoring reports documenting species-specific transplantation success) that the proposed mitigation will be feasible. The Conceptual Planting Plan and Long-term Maintenance and Preservation Plan shall be prepared by a biologist with expertise in southern California ecosystems and native plant restoration techniques and submitted to the Wildlife Agencies for review and approval prior to implementation. The Plans shall discuss the following, at a minimum: 1) species-specific planting (i.e. container or seed) methods; 2) species-specific measurable goals and success criteria (e.g. number of individuals, percent survival rate, absolute cover) for establishing self-sustaining populations; 3) long-term monitoring; 4) location of transplantation/restoration sites; 5) a description of the irrigation methodology; 6) measures to control exotic vegetation; 7) contingency measures, should the success criteria not be met; and 8) conservation of the mitigation site in perpetuity. The Long-term Maintenance and Preservation Plan shall specify how it will be implemented, who the responsible party for overseeing the implementation is, and when it will be approved. Further coordination with USFWS may be necessary to ensure that proposed mitigation for the ESA-listed California seablite is adequate.

The comment also requests that translocation plans be provided to the CDFW for review, comment, and concurrence. While concurrence on restoration plans is not required, the City looks forward to working with the CDFW, as well as additional stakeholders, through the public engagement process of the GDP.

COMMENT #8: Mitigation Measure BIO 5.3-2 (MM BIO 5.3-2), Bats

DPEIR, Section 5.3, Page 5.3-2

Issue: Mitigation Measure BIO 5.3-2 does not adequately avoid or mitigate impacts to special-status bat species with the potential to roost or forage on the Project site.

Specific impact: Ornamental trees and structures in the Project area provide suitable roosting habitat for four Species of Special Concern (SSC), which are not covered species under the MSCP: western red bat, western yellow bat, pallid bat, and Mexican long-tongued bat. Common species hoary bat and western small-footed myotis may also roost in the trees. The ornamental trees are located in the Campland area, De Anza Cove, and the Mission Bay Tennis Center, Athletic Fields, and Golf Course (MBTAG) in the central and eastern areas of the Project site. The abandoned structures and mobile homes within De Anza Cove provide suitable roosting habitat for Mexican long-tongued bat and other structure-dwelling bats. Mexican long-tongued bats may use the vegetation for foraging during migration and winter months; pallid bat and western small-footed myotis may forage over open water in the Project area (BRTR 5.4.7, P. 80). The BRTR indicates that bat guano was observed in the abandoned mobile homes during the October 2022 biological resource surveys, but no nighttime focused acoustic surveys were conducted. The BRTR acknowledges that bats are likely roosting and foraging in the suitable habitat within the Project area.

Section F of MM BIO 5.3-2 addresses structure clearance and states:

"Prior to the issuance of any permit to allow for the removal or demolition of trees and existing structures within the project area (particularly the ornamental trees and existing buildings in Campland on the Bay, De Anza Cove, and the Mission Bay Tennis Center, Athletic Fields, and Golf Course), the qualified monitoring biologist shall conduct clearance surveys to flush out any wildlife species nesting, roosting, or otherwise occupying the trees or structures. If wildlife species are encountered within any of the trees or structures (outside the general bird nesting season), the qualified monitoring biologist shall remove them, if possible, or provide them with a means of escape and allowed the species to disperse. If tree-roosting bats are suspected, slow removal by gently pushing the tree over with heavy equipment is required."

As written, MM BIO 5.3-2 does not adequately avoid, minimize, or mitigate potential impacts to special-status bats.

Why impact would occur: Direct impacts to roosting bats will occur from removal of ornamental trees and structures within the Project site that host roosting bat colonies. Flushing bats from active roosting habitats and downing trees that are being used for roosting may crush bats, cause disruption of maternal colonies, and result in a decline of breeding success. Indirect impacts could occur from removal of foraging habitat, human interference, light disturbance, or construction noise.

Evidence impact would be significant: As per CEQA Section 15380, impacts to species identified as California Species of Special Concern are considered significant due to their designation as species requiring special attention and protection. These species are

S2-13: This comment states that MM BIO 5.3-2 does not adequately avoid or mitigate impacts to special-status bat species and provides additional recommendations for special-status bat species mitigation measures. As discussed in PEIR Section 5.3, as future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project, and any impacts to bats would be avoided, minimized, or mitigated prior to the implementation of the future site-specific projects. Project-specific plans would be prepared in accordance with the City's Biology Guidelines, including site-specific recommendations for impacts to bat species. The recommendations identified in the comment would be more appropriate to submit for consideration during future project-level review. No revisions to the PEIR are warranted.

S2-13

recognized by CDFW as being at risk or vulnerable. Impacts to species listed as endangered, threatened, or rare by federal or state agencies, such as those designated as California Species of Special Concern, are presumed to be significant impacts under CEQA (CEQA §§ 15063 & 15065). Any adverse effects on these bat species would be presumed to have significant environmental impacts and would require thorough analysis and mitigation measures implemented within the PEIR to minimize or avoid such impacts.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #2: To reduce potential impacts to special-status bat species to less than significant, the following protocol shall be incorporated into the PEIR:

1. An initial bat survey shall be conducted by a qualified bat biologist during the maternity season (March 1 to August 31) to confirm if any maternity colonies have been established within the Project site. Survey protocol should include a combination of suitable habitat inspection and sampling, as well as at least one evening emergence and acoustic survey. Any ground disturbance or removal of vegetation/suitable roosting habitat should be conducted no more than three days after pre-construction surveys are completed. Furthermore, eviction of any bats found day-roosting during the maternity season should be avoided.

2. If an active roost is identified during maternity season, CDFW requests the opportunity to review any mitigation and exclusion plans for concurrence prior to implementation. Removal of the roost should only occur outside of the maternity season, when the mitigation plan has been approved by CDFW, and only when bats are not present in the roost. The mitigation plan should detail the methods of excluding bats from the roost and the plans for a replacement roost in the vicinity of the Project site.

The plan shall include: (a) a description of the species targeted for mitigation; (b) a description of the existing roost or roost sites; (c) methods to be used to exclude the bats if necessary; (d) methods to be used to secure the existing roost site to prevent its reuse prior to removal; (e) the location for a replacement roost structure; (f) design details for the construction of the replacement roost; (g) monitoring protocols for assessing replacement roost use; (h) a schedule for excluding bats, demolishing of the existing roost, and construction of the replacement roost; and (i) contingency measures to be implemented if the replacement roosts do not function as designed.

3. If special-status bat species or a maternity roost of any bat species is present, but no direct removal of active roosts will occur, specific avoidance measures should be determined by the bat biologist, which may include implementation of a construction-free buffer around the active roost. Combustion equipment such as generators, pumps, and vehicles should not be parked or operated under or adjacent to the roost habitat. Vibration and noise should be avoided, and personnel should not be present directly under the colony.

4. If the pre-construction survey determines that no active roosts are present, then trees/suitable habitat should be removed within three days following the pre-construction survey. All potential roost trees should be removed in a manner approved by a qualified

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bat biologist, which may include presence of a biological monitor. Additionally, all construction activity in the vicinity of an active roost should be limited to daylight hours.

COMMENT #9: Mitigation Measure 5.3-4, Native Eelgrass Impacts

Issue: Impacts to eelgrass (*Zostera Marina*, *Zostera pacifica*), highly productive habitat forming species, shall be avoided and minimized to the maximum extent practicable to achieve a no net loss of eelgrass habitat function.

Specific Impact: The Draft PEIR has identified eelgrass as a species that is found within the Project area where the burial or excavations/dredging, placement of fill material, and pile driving impacts may occur. Additionally, significant impacts may occur to associated eelgrass ecological communities such as benthic and epibenthic invertebrates, fish, and marine birds.

Why impact would occur: Eelgrass beds are considered sensitive habitat types and the Project has potential direct impacts to eelgrass beds resulting from the burial or excavations/dredging, placement of fill material, and pile driving within Mission Bay. Additionally, impacts to eelgrass beds result in direct or indirect impacts to a variety of marine species that inhabit the beds. For example, the California spiny lobster (*Panulirus interruptus*) may utilize the open subtidal Bay habitats within or adjacent to the proposed Project and use eelgrass for shelter which is present throughout the shallow area of the Bay. This species and their habitat are vulnerable to direct and indirect dredging, excavation, fill, burial, turbidity, and sedimentation impacts.

Evidence impact would be significant: Native eelgrass species create large beds beneficial for fish habitat and have been identified as a special aquatic site and given protections by the Clean Water Act. The Magnuson-Stevens Fishery Conservation and Management Act (MSA) identifies eelgrass as a Habitat Area of Special Concern. Additionally, the importance of eelgrass protection and restoration, as well as the marine ecological benefits of eelgrass, is identified in the California Public Resources Code (PRC §35630). CDFW uses the California Eelgrass Mitigation Policy (CEMP) (NOAA 2014), developed by the National Marine Fisheries Service (NMFS), for guidance on identifying eelgrass impacts, eelgrass mitigation measures and compensation, and for identifying appropriate eelgrass mitigation and donor sites.

Recommended Potentially Feasible Mitigation Measures

Mitigation Measure #3: While CDFW appreciates the Eelgrass Beds Creation mitigation measure noted in the Draft PEIR (Mitigation Measure 5.3-4), CDFW disagrees that the remaining 1:1 creation mitigation required for eelgrass beds habitat may occur outside Mission Bay, if necessary. Since in-kind mitigation is the preferred option to compensate for impacts to eelgrass, CDFW recommends that all mitigation for eelgrass impacts should be in-kind mitigation in Mission Bay to the greatest extent feasible.

Contaminated or high silt and organic content sediments should not be placed in the marine environment that are not compatible with existing native sediment. High silt content sediments may cause marine soft substrates to be compacted and unsuitable for sustained growth of eelgrass and intertidal and subtidal benthic and epibenthic invertebrates.

S2-14

S2-14: This comment states that impacts to eelgrass shall be avoided and minimized to the maximum extent practicable to achieve a no net loss of eelgrass habitat function. The City concurs that eelgrass would be avoided and minimized to achieve a no net loss of eelgrass habitat function. Mitigation to avoid and minimize impacts to eelgrass is proposed in accordance with the City's Municipal Code, Land Development Code—Biology Guidelines, and Mission Bay Park Natural Resource Management Plan.

This comment also disagrees that the remaining 1:1 creation mitigation required for eelgrass bed habitat may occur outside Mission Bay, if necessary. Consistent with the Mission Bay Park Natural Resource Management Plan and in response to this comment, MM BIO 5.3-4 in the PEIR and MM BIO-4 in the Biological Resources Technical Report have been revised as follows:

PEIR Section 5.3, Biological Resources

MM BIO 5.3-4 Eelgrass Beds Creation. Potential direct impacts to eelgrass beds caused by placement of fill material within Mission Bay shall be mitigated in accordance with the requirements of the resource agencies and the City of San Diego. The City of San Diego shall require a mitigation ratio of 2:1, in accordance with the City of San Diego's Municipal Code, Land Development Code—Biology Guidelines (see table in MM BIO 5.3-3). In addition, at a minimum, the no net loss creation mitigation (1:1) for eelgrass beds habitat shall be required to occur within Mission Bay itself per the Mission Bay Park Natural Resource Management Plan to the greatest extent feasible. ~~The~~

S2-14
cont.

Compatible sediments are required for healthy marine invertebrate habitat needed for forage of the higher trophic levels such as fish and shorebirds. CDFW recommends using compatible sediments when placing fill material in Mission Bay.

CDFW recommends that plans should be developed to avoid and minimize potential impacts to eelgrass to the maximum extent feasible since eelgrass beds or patches are identified within or adjacent to the Project area. The proposed Project should avoid and minimize disturbance and damage or losses to eelgrass beds from placement of material fill, pile driving, potential shading from construction activities or new structures, and from associated barges and vessels to the maximum extent feasible. Impacts to avoid and minimize may include, at a minimum, barge shading and anchoring within eelgrass habitat, pile driving and pile pulling bottom disturbances, demolition and construction turbidity, sedimentation, and falling debris. CDFW recommends the following should eelgrass beds or patches be identified within or adjacent to the Project area:

- To avoid direct eelgrass impacts, locate pile driver barges and vessels and all barge anchoring outside of eelgrass habitat.
- To avoid scouring of eelgrass and potential eelgrass habitat, anchor chain designs, and locations of barge and vessel moorings should avoid eelgrass habitat impacts.
- To avoid and minimize eelgrass impacts from demolition and construction debris, the City of San Diego should use Best Management Practices (BMPs) such as perimeter debris booms. If debris is observed falling into the Mission Bay water, retrieve debris as soon as possible.
- To minimize eelgrass impacts from water turbidity and sedimentation, install silt curtains around pile driving or demolition areas if applicable. Restrict the turbidity plumes to the smallest possible area during all phases of in-water construction.

Additionally, if eelgrass habitat is identified in the Project area, comprehensive pre- and post-construction surveys for eelgrass beds or patches should be conducted consistent with the CEMP and a map of the existing eelgrass wetland habitat should be provided in the Final PEIR. If any unavoidable eelgrass impacts occur, these impacts should be compensated using guidance described within the CEMP. Indirect eelgrass impacts such as shading from new piles should also be avoided. Since pile driving work conducted outside of the peak eelgrass growing period may reduce shading impacts when eelgrass beds may have died back, pile location and time of year for pile driving should be considered to avoid eelgrass and other fish and wildlife impacts generated by pile driving. If expected eelgrass losses are unavoidable, the City of San Diego should use guidance from the CEMP to compensate for the losses. Final eelgrass losses should be determined after construction and eelgrass impact monitoring surveys are complete. Draft pre-construction eelgrass Mitigation, Monitoring, and Reporting Plans (Plan) should be developed in consultation with CDFW and other permitting and resources agencies. Minimum Plan elements should include:

- Prior to construction, a draft mitigation Plan should be developed based on updated eelgrass surveys. The Plan should be finalized along with the final eelgrass impacts analysis once post-construction and impacts monitoring surveys are completed.

~~remaining 1:1 mitigation required may occur outside Mission Bay, if necessary.~~

Appendix D, Biological Resources Technical Report

MM BIO-4 Eelgrass Beds Creation. Potential direct impacts to eelgrass beds caused by placement of fill material within Mission Bay shall be mitigated in accordance with the requirements of the resource agencies and the City of San Diego. The City of San Diego shall require a mitigation ratio of 2:1, in accordance with the City of San Diego's Municipal Code, Land Development Code—Biology Guidelines (see table in MM BIO-3). In addition, at a minimum, the no net loss creation mitigation (1:1) for eelgrass beds habitat shall be required to occur within Mission Bay itself per the Mission Bay Park Natural Resource Management Plan to the greatest extent feasible. ~~The remaining 1:1 mitigation required may occur outside Mission Bay, if necessary.~~

This comment also provides additional recommendations for eelgrass mitigation measures. The recommendations identified in the comment would be more appropriate to submit for consideration during future project-level review. No further revisions to the PEIR are warranted.

S2-14
cont.

- The Plan should include a summary of eelgrass habitat impacts. The summary should include conservation measures for eelgrass avoidance, minimization, and eelgrass compensatory mitigation if necessary.
- If compensatory mitigation is required for eelgrass impacts, mitigation ratios should be determined, at a minimum, in accordance with the CEMP, and as recommended by CDFW and other agencies.
- The Plan should identify CDFW as an agency to receive and review draft and final eelgrass mitigation and monitoring reports, surveys, and plans.
- If eelgrass harvesting and transplanting is proposed, healthy eelgrass donor sites should be identified during preliminary eelgrass impact surveys or during separate pre-harvest eelgrass donor site surveys.

If eelgrass harvest and transplanting is required for mitigation, a Scientific Collecting Permit (SCP) from CDFW will be required prior to harvest and transplanting activities. The SCP may include permit conditions such as donor eelgrass surveys, submittal of an eelgrass harvest and transplant plan, limits on number of turions collected, methods for collection and transplanting, notification of activities, and reporting requirements. Please visit CDFW's SCP webpage for more information: <https://wildlife.ca.gov/Licensing/Scientific-Collecting>.

An eelgrass mitigation site is located just south of the Project footprint. The mitigation site was created to mitigate for eelgrass impacts related to the Mission Bay Navigational Channel Dredging Project completed three years ago. This eelgrass mitigation site should be identified and addressed in the Final PEIR. Avoidance and minimization measures should be proposed for the eelgrass mitigation site.

III. Additional Comments and Recommendations

COMMENT #10: Recreational Use

a) **Recreation:** Several habitat design elements in the Project description incorporate recreational use. The DPEIR states, "The intent of the expanded wetlands is to provide a natural environment for recreation, mitigate for other disturbed environments, and benefit wildlife" (DPEIR, Page 3-4). Additionally, a multi-use path is proposed through the upland (dune, sage) and buffer habitat areas, as depicted in Figure 3-1.

Recommendation #7: Development of trails within native habitat areas should be analyzed within the PEIR for potential habitat edge effects. Trail and path development footprints should be excluded from acreage calculations for upland habitat. Recreational activities in wetlands should be limited only to activities that will not disturb wildlife, particularly special-status birds, or activities for scientific/education purposes. The PEIR should discuss what activities will be allowed, what areas will be open for public access as opposed to activities more limited in their occurrence as may be allowed by special approval by the City, and how regulations will be enforced.

b) **Camping:** The DPEIR states, "The project would place low-cost visitor guest accommodation use on the eastern side of Rose Creek, buffered by upland vegetation. This land use would allocate approximately 48.5 acres for RV's, cabins, or other eco-friendly accommodations and associated open space and facilities consistent with camping

S2-15
S2-16

S2-15: This comment states that development of trails within native habitat areas should be analyzed for edge effects. PEIR Section 5.3 analyzes potential indirect impacts from operational activities to sensitive plant species, wildlife species, and vegetation communities, which would include development of trails in native habitat areas. Permanent edge effects may include intrusion by humans and domestic pets, resulting in possible trampling of individual plants, invasion by exotic plant and wildlife species, exposure to urban pollutants (fertilizers, pesticides, herbicides, and other hazardous materials), soil erosion, litter, fire, and hydrologic changes (e.g., surface and groundwater level and quality). Refer to response to comment S2-6. Specific design and location of the multi-use trails is unknown at this time. As part of the GDP process, as future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project, and any impacts would be avoided, minimized, or mitigated as conditions of subsequent project approval prior to the implementation of the future site-specific projects.

The comment also recommends that the PEIR discuss what activities would be allowed in the wetland areas. PEIR Chapter 3.0 provides a definition of each proposed land use type, including types of public use activities that may occur on the project site. As discussed in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. Fencing, signage, appropriate barriers may be used to limit activities in the wetland areas. Specific activities that would occur, areas open for public access, activities allowed by special approval, and enforcement measures would be detailed in future GDPs as they are developed. No revisions to the PEIR are warranted.

S2-16
cont.

accommodations." As indicated in prior letters (CDFW 2018 and 2022), CDFW does not consider RV camping to be a passive recreational use and must be considered as producing a direct impact to the MHPA. The MBPMP states, "The SSA [Project area] shall not be developed to the detriment of existing and/or future adjacent habitat areas. Foremost in consideration should be the extent to which the SSA can contribute to the Park's water quality. In fact, additional wetlands creation must be considered as part of the SSA." The PEIR should discuss how natural resources adjacent to the low-cost visitor accommodations will be affected by RV and active recreational use.

Recommendation #8: CDFW recommends that the PEIR analyze the proposed low-cost guest housing and RV use on the De Anza peninsula as an active recreational use and discuss how surrounding natural habitat will be impacted. To maximize habitat values and improve water quality, we continue to recommend that commercial and other land use developments be strategically located farthest away from sensitive resources to include wetlands and open waters.

c) **Watercraft:** The DPEIR indicates that a boat facility and shared clubhouse will be constructed on the northern shore of De Anza Cove, with 1 acre of water use for non-motorized boats. The DPEIR states that the sandy beach area at the northern and western edges of De Anza Cove will be, "protected by buffers/safety measures that would delineate the edges/ extents of the non-motorized boat use" (DPEIR Section 3.3.1.1., Page 3-4). While we appreciate limitation of De Anza Cove to non-motorized watercraft, the DPEIR should include further discussion of measures to prohibit motorized watercraft from entering De Anza Cove, particularly adjacent to the created wetlands.

S2-17

As addressed in our comment letter in response to the NOP (CDFW, 2022), CDFW recommends that De Anza Cove be limited to non-motorized watercraft and swimming uses only. Allowing motorized watercraft activities in De Anza Cove risks damage to the proposed eastern wetlands, resulting from boats operating close to, or directly in, wetland areas. Noise from motors may also disturb nesting or foraging avian species. Indirect impacts to the wetlands could occur from pollution and increased turbidity caused by motorized watercraft. Motorized watercraft access currently exists just east of the Project boundary at the De Anza Boat Launch.

Recommendation #9: CDFW recommends that the DPEIR elaborate on the specific buffers/safety measures that will delineate the non-motorized boat use area, and include discussion on what measures will be taken to ensure that motorized watercraft do not enter De Anza Cove.

S2-18

COMMENT #11: Multi-Habitat Planning Area (MHPA) Boundary Line Adjustment (BLA)

The PEIR indicates that no Multiple Habitat Planning Area (MHPA) boundary line adjustments (BLA) are anticipated as part of the Project; however, the City may decide to process a BLA to add the natural habitat creation and restoration areas to the MHPA in the future. CDFW recommends that the City consult with the Wildlife Agencies (CDFW and United States Fish and Wildlife Service (USFWS)) to resolve any proposed BLA prior to the circulation of the Final PEIR.

S2-16: This comment states that the PEIR should analyze guest housing and RV use on the De Anza peninsula as an active recreational use and should discuss how natural resources adjacent to the low-cost visitor guest accommodation areas would be affected by RV use. PEIR Section 5.3 identifies the potential direct impacts to sensitive vegetation communities and land cover types within each of the proposed project areas. Refer to response to comment S2-6. As discussed in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding implementation of the project, including potential locations of camping, RV use, cabins, and active recreational uses, are not currently available. The mitigation framework provided in the PEIR is adequate for program-level environmental review of the project. As discussed in PEIR Section 5.3, as future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project. At that time, specific mitigation measures would be developed based on the site-specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. No revisions to the PEIR are warranted.

S2-17: This comment recommends that the PEIR include a discussion on measures that would be included to prohibit motorized watercraft from entering De Anza Cove. The City has taken this comment into consideration, and revisions to the Amendment have been made to clarify that channels accessing the cove are not intended to be used by large or motorized boats. As discussed in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding the buffers and safety measures associated

S2-18
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Recommendation #10: To ensure consistency with the MSCP's conservation goals and objectives, the Final PEIR should provide full disclosure and functional equivalency analysis of the proposed BLA per Sections 1.1.1 and 5.42 of the MSCP SAP (City of San Diego 1997). The Wildlife Agencies will need to agree and provide written concurrence for the requested BLA after we have had the opportunity to review all information provided by the City. When evaluating a proposed BLA and habitat equivalency assessment, the Wildlife Agencies generally consider the following biological goals:

- No net loss of MHPA acreage;
- No net reduction of higher sensitivity vegetation communities (i.e., Tier I, II, IIIa and IIIb);
- Net impacts/conservation of covered species resulting from the BLA;
- Net impacts/conservation of covered non-covered sensitive species resulting from the BLA; and
- Landscape configuration to minimize edge effects and maintain connectivity of the MHPA (i.e., net effects to 'Preserve Design')

COMMENT #12: Jurisdictional Delineation and 1600 Notification

A program-level jurisdictional delineation was conducted to determine the extent of wetlands and non-wetland waters under the jurisdiction of CDFW and other jurisdictional agencies. CDFW is included as a jurisdictional agency in Table 10 of the BRTR, which provides a summary of aquatic resources potentially under the jurisdiction of the US Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), California Coastal Commission (CCC), CDFW, and/or the City. The jurisdictional aquatic resources are also summarized in Table 2-5 in the DPEIR; however, CDFW is not included on the list of jurisdictional agencies:

Table 10. Jurisdictional Aquatic Resources in the Project Area (Acres)

General Vegetation Type	SDBG Vegetation Community	Jurisdiction	Acreage
Wetland and Riparian Areas			
Disturbed Wetland (Arundo)	Disturbed Wetland	USACE/RWQCB/CCC/CDFW/City	0.02
Disturbed Freshwater Marsh	Freshwater Marsh	USACE/RWQCB/CCC/CDFW/City	0.38
Lotgrass	Lotgrass beds	USACE/RWQCB/CCC/CDFW/City	83.74
Salt Prairie	Salt Prairie	USACE/RWQCB/CCC/CDFW/City	1.14
Mudflat	Marine Habitat	USACE/RWQCB/CCC/CDFW/City	34.73
Southern Coastal Salt Marsh	Salt Marsh	USACE/RWQCB/CCC/CDFW/City	45.69
Wetland and Riparian Areas Total¹			165.67
Non-Wetland Waters			
Open Water	Natural Hard Channel/Marine Habitat	USACE/RWQCB/CCC/CDFW/City	107.32
Tidal Channel ¹	Marine Habitat	USACE/RWQCB/CCC/CDFW/City	2.57
Non-Wetland Waters Total¹			109.89
Total¹			275.56

Note: CCC = California Coastal Commission; CDFW = California Department of Fish and Wildlife; RWQCB = Regional Water Quality Control Board; USACE = U.S. Army Corps of Engineers
¹ Acreage may not sum due to rounding.

S2-19

with the non-motorized boat use are not currently available. Design during the GDP process would take into account potential impacts, and measures would be included at that time to avoid and minimize potential impacts by dredging and motorized boat activity. No revisions to the PEIR are warranted.

S2-18: This comment recommends that the PEIR include a full disclosure and functional equivalency analysis of the proposed boundary line adjustment (BLA) per Sections 1.1.1 and 5.42 of the Multiple Species Conservation Program Subarea Plan. As discussed in PEIR Section 5.3, the project does not propose a Multiple Habitat Planning Area (MHPA) BLA. Upon successful habitat creation in the project area, the City may propose to add the successful habitat creation area to the MHPA preserve through the MHPA BLA process and would look forward to working with the wildlife agencies at that time. No revisions to the PEIR are warranted.

Jurisdictional Aquatic Resource	Jurisdiction	Acres
Wetland and Riparian Areas		
Disturbed Wetland (Arundo)	USACE/RWQCB/CCC/City	0.02
Disturbed Freshwater Marsh	USACE/RWQCB/CCC/City	0.38
Eelgrass	USACE/RWQCB/CCC/City	83.74
Salt Panne	USACE/RWQCB/CCC/City	1.11
Mudflat	USACE/RWQCB/CCC/City	34.73
Southern Coastal Salt Marsh	USACE/RWQCB/CCC/City	45.69
Wetland and Riparian Areas Total		165.67
Non-Wetland Waters		
Open Water	USACE/RWQCB/CCC/City	107.12
Tidal Channel	USACE/RWQCB/CCC/City	2.57
Non-Wetland Waters Total		109.69
Total		275.36

Source: Appendix D
 Notes: City = City of San Diego; CCC = California Coastal Commission; USACE = U.S. Army Corps of Engineers; RWQCB = Regional Water Quality Control Board

The Project area supports aquatic, riparian, and wetland habitats. As discussed in the DPEIR (Section 1.3.2.5, Page 1-5), the CDFW has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of an LSAA for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. CDFW as a Responsible Agency under CEQA may consider the City's PEIR for the Project. The DPEIR indicates that no permits are required from CDFW at the time of the Programmatic document but acknowledges that permits may be required as future development projects are implemented.

Recommendation #11: Table 2-5 in the DPEIR should be updated to include CDFW on the list of jurisdictional agencies, for consistency with Table 10 in the BTRR. We additionally look forward to further consultation with the City regarding submittal of a streambed notification package to the Lake and Streambed Alteration Program, per Fish and Game Code section 1600 et seq., particularly for aspects of the Project that will occur in Rose Creek.

COMMENT #13: Mitigation Plans and Long-term Maintenance

The Summary of Significant Environmental Impacts table (DPEIR, Table S-4) references several plans that will be developed and implemented as the site-specific elements of the Project progress, including:

S2-19
cont.

S2-20

S2-19: This comment advises that PEIR Table 2-5, Jurisdictional Aquatic Resources in the Project Area (Acres), should be updated to add CDFW to the list of jurisdictional agencies. The City agrees with this request, and Table 2-5 has been revised as shown:

Jurisdictional Aquatic Resource	Jurisdiction	Acres
Wetland and Riparian Areas		
Disturbed Wetland (Arundo)	USACE/RWQCB/CCC/CDFW/City	0.02
Disturbed Freshwater Marsh	USACE/RWQCB/CCC/CDFW/City	0.38
Eelgrass	USACE/RWQCB/CCC/CDFW/City	83.74
Salt Panne	USACE/RWQCB/CCC/CDFW/City	1.11
Mudflat	USACE/RWQCB/CCC/CDFW/City	34.73
Southern Coastal Salt Marsh	USACE/RWQCB/CCC/CDFW/City	45.69
Wetland and Riparian Areas Total		165.67
Non-Wetland Waters		
Open Water	USACE/RWQCB/CCC/CDFW/City	107.12
Tidal Channel	USACE/RWQCB/CCC/CDFW/City	2.57
Non-Wetland Waters Total		109.69
Total		275.36

Source: Appendix D
 Notes: City = City of San Diego; CCC = California Coastal Commission; CDFW = California Department of Fish and Wildlife; USACE = U.S. Army Corps of Engineers; RWQCB = Regional Water Quality Control Board

S2-20: This comment recommends that any plans relating to habitat design elements or mitigation aspects of the project be developed in coordination with and subject to review and approval by the wildlife agencies. The City concurs that, when available, future project Conceptual Restoration Plans, Long-Term Maintenance and Preservation Plans, Biological Construction Mitigation/Monitoring Exhibits, Habitat Mitigation and Monitoring Plans, and Habitat Mitigation and Monitoring Plans (eelgrass) would be prepared. Project-specific restoration plans would be prepared in accordance with the City's Biology Guidelines, Attachment B. The City looks forward to working with the CDFW and additional stakeholders through the public engagement opportunities of the GDP process. No revisions to the PEIR are warranted.

S2-20
cont.

- 1) MM BIO 5.3-1: Conceptual Restoration Plan
- 2) MM BIO 5.3-1: Long-term Maintenance and Preservation Plan
- 3) MM BIO 5.3-1: Biological Construction Mitigation/Monitoring Exhibit
- 4) MM BIO 5.3-3(c): Habitat Mitigation and Monitoring Plan
- 5) MM BIO 5.3-4: Habitat Mitigation and Monitoring Plan (eelgrass)

Recommendation #12: Any future plans should detail the success criteria of the habitat creation/restoration components of the Project, discuss how they will be preserved in perpetuity, and indemnify their success through financial sureties. CDFW recommends that any plans relating to habitat design elements or mitigation aspects of the Project be developed in coordination with, and be subject to review and approval by, the Wildlife Agencies.

COMMENT #14: Constructed Oyster Beds

S2-21

To improve water quality, the Draft PEIR proposes to create "green" infrastructure such as constructed oyster beds at shorelines where oyster colonization is feasible. With limited details from the Draft PEIR, CDFW is identifying the proposed infrastructure an artificial reef as defined in Fish and Game Code. CDFW has authority for artificial reefs under a variety of roles including Statutory/Legislative Authority, Trustee and Responsible Agency Status under CEQA and the Marine Life Management Act, and an advisory role to other agencies. Fish and Game Code Section 6420-6425 established the California Artificial Reef Program (CARP) through legislation in 1985. The program was created to investigate the potential to enhance declining species through the placement of artificial reefs and is currently unfunded with no identified source of funding. However, the CARP does not consider reef placement for mitigation, dampening effects of sea level rise, improve diving opportunities, or restoration. In order to provide adequate consultation and advice to the principal permitting agencies on reef design, development, and purpose, CDFW needs a comprehensive statewide scientifically based plan for overseeing the placement of artificial reefs in state waters.

Recommendation #13: Without a scientifically based statewide artificial reef plan for California, CDFW does not recommend any new artificial reef or artificial habitat at this time, regardless of intent. CDFW recommends providing additional discussion within the Final PEIR as to why the treatment would be necessary to achieve the goal to improve water quality. In addition, CDFW recommends including alternatives to the constructed oyster beds that could still achieve similar shoreline protection goals.

CDFW is concerned artificial reefs and habitat creation could attract invasive species. If the constructed oyster beds are implemented as currently described within the Draft PEIR, CDFW recommends that the Final PEIR include discussion on developing an invasive species monitoring plan that includes monitoring measures, adaptive management measures, and protocols if invasive species are identified.

Additionally, CDFW is concerned that placement of the constructed oyster beds would potentially decrease the amount of habitat for further eelgrass expansion. CDFW recommends the Final PEIR include additional discussion on whether the installation of the oyster beds would be within current and/or future eelgrass habitat and whether it could prevent future expansion of eelgrass if it were to be implemented.

S2-21: This comment expresses concern over the construction of oyster beds as "green" infrastructure. PEIR Chapter 3.0 states that "green" infrastructure would be implemented and provides oyster beds as one option for green infrastructure implementation at shorelines where oyster colonization is feasible. Refer to response to comment S2-6. No specific development, including constructed oyster beds, is currently proposed. Therefore, specific details are not currently available as requested in this comment. The City has committed to using the latest science and data from agencies such as National Oceanic and Atmospheric Administration and National Marine Fisheries Service, as well as the California Artificial Reef Program, in the future to implement nature-based solutions. Any potential impacts associated with green infrastructure would be identified consistent with the City's GDP process for future site-specific projects. As future site-specific projects with constructed oyster beds come forward, a comprehensive state-wide scientifically based plan for overseeing the placement of artificial reefs in state waters would be considered. No revisions to the PEIR are warranted.

COMMENT #15: Invasive Species Impacts

S2-22

Disturbance of the bottom sediments from potential pile construction, dredging construction, or anchoring may redistribute non-native species that compete with native species. This could cause widespread adverse impacts to eelgrass and the marine ecology. The invasive alga *Caulerpa taxifolia* is listed as a federal noxious weed under the U.S. Plant Protection Act, and while deemed eradicated in 2006, is monitored for potential future emergence. Another invasive alga species found recently in Newport Bay is *Caulerpa prolifera*, which is also a potential threat to growth and expansion of native eelgrass beds and other native algae.

Recommendation #14: CDFW recommends including a mitigation measure detailing a pre-construction *Caulerpa spp.* survey to identify potential existence of invasive *Caulerpa spp.* as described in the *Caulerpa* Control Protocol <https://www.fisheries.noaa.gov/west-coast/habitat-conservation/aquaticinvasive-species-west-coast>. If *Caulerpa spp.* are found, do not disturb the species and contact CDFW and National Marine Fisheries Service within 24 hours as described in the *Caulerpa* Control Protocol.

COMMENT #16: De Anza Cove Boat Ramp Removal

S2-23

The Draft PEIR notes that watercraft access would be provided on De Anza Cove, and that the existing boat ramp at the western end of De Anza Cove would be removed. The Draft PEIR did not provide information or methods on how the piles or rock from the boat ramp would be removed.

Recommendation #15: CDFW recommends an analysis of the potential piles or rock that would be involved in the existing boat ramp removal construction in the Final PEIR. If no further analysis is done, CDFW assumes the analysis will be done in subsequent CEQA documents.

COMMENT #17: CDFW Fully Protected Species

S2-24

As indicated in the DPEIR, "According to Sections 3511 and 4700 of the California Fish and Game Code, which regulate birds and mammals, respectively, a "fully protected" species may not be taken or possessed without a permit from the California Fish and Game Commission, and "incidental take" of these species are not authorized" (DPEIR, P4-16).

Recommendation #16: Future site-specific analysis should ensure that impacts to species designated as Fully Protected (FP), regardless of their status as covered species under the MSCP SAP, cannot lead to the death of any individuals. FP species may not be taken or possessed at any time per § 3511 of the Fish and Game Code. Avoidance measures for avian species may include phasing construction to occur outside of nesting season, conducting species-specific surveys when construction will occur within 500 feet of a nesting site, retaining a qualified biological monitor on-site during construction, and implementation of no-activity buffers around active nests.

S2-22: This comment recommends that a mitigation measure be added to the PEIR detailing a pre-construction green algae (*Caulerpa spp.*) survey to identify the potential existence of invasive *Caulerpa spp.*, as described in the *Caulerpa* Control Protocol. As part of the GDP process, focused biological surveys would be conducted for the future specific projects in accordance with the City's Biology Guidelines. Depending on the specific project location in the project area, this may include surveys for *Caulerpa spp.*

In response to this comment, PEIR Section 5.3.3.8, Issue 8: Invasive Species, has been revised as follows:

Implementation of the project could result in potential impacts from the introduction of invasive plant species into natural open space areas within the MHPA and KFMR/NWP, including aquatic areas. Invasive species have the potential to establish and displace native species through competition for limited resources, resulting in monotypic stands of invasive species habitat that does not support other native species, including wildlife. These impacts from invasive species could occur through human intrusion into natural open space areas, from unintended dispersal of invasive species seed during eradication efforts, and from the exposure of bare soil areas during construction activities adjacent to these natural areas, which can provide jump-off locations for invasive species to establish and subsequently disperse into the natural open space areas. Impacts would be potentially significant **(Impact 5.3-4)**.

Impact 5.3-4 The proposed project could result in an introduction of invasive species of plants into natural open space areas, including aquatic areas.

S2-23: This comment recommends that additional details on the boat ramp removal be included in the PEIR. Additional details on the construction are not known at this time. Refer to response to S2-6. As stated in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. When a future site-specific project with boat ramp removal comes forward, project-specific analysis would be conducted in the review phase of the project, and any impacts would be avoided, minimized, or mitigated prior to implementation of the future site-specific projects. The City looks forward to working with the CDFW and additional stakeholders through the public engagement opportunities of the GDP process. No revisions to the PEIR are warranted.

S2-24: This comment recommends that future site-specific analysis should ensure that impacts to species designated as Fully Protected (FP), regardless of their status as covered species under the Multiple Species Conservation Program Subarea Plan, do not lead to the death of any individuals. As discussed in PEIR Section 5.3, as future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project. Potential impacts to FP species would be precluded by implementation of specific measures, which are included as conditions of future site development permits. No revisions to the PEIR are warranted.

COMMENT #18: CESA-listed Species

As indicated in prior comment letters, CDFW considers adverse impacts to a species protected by CESA, for the purposes of CEQA, to be significant without mitigation (CDFW 2018, CDFW2022). As to CESA, take of any endangered, threatened, or candidate species not already covered by the City's SAP that results from the Project is prohibited, except as authorized by state law (Fish & G. Code, §§ 2080, 2085).

Recommendation #17: If any site-specific elements of the Project will result in take of a species designated as endangered or threatened, or as a candidate for listing under CESA, unless covered by the City's SAP permit, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and G. Code §§ 2080.1, 2081, subds. (b), (c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

S2-25

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

S2-26

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

S2-27

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the City in identifying and mitigating Project impacts on biological resources.

S2-28

S2-25: This comment recommends that the City seek appropriate take authorization under the California Endangered Species Act (CESA) prior to implementing site-specific elements of the project, which may include an Incidental Take Permit. If necessary, the City will work with the CDFW at that time to seek take authorization under CESA or through Section 9.7 of the City's Implementing Agreement with the wildlife agencies for the establishment of the Multiple Species Conservation Program. No revisions to the PEIR are warranted.

S2-26: This comment requests that any special-status species and natural communities detected during project surveys be reported to the California Natural Diversity Database (CNDDDB). As discussed in PEIR Section 5.3, as future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project, species surveys would be conducted as necessary, and impacts would be avoided, minimized, or mitigated prior to the implementation of the future site-specific projects. When survey results are available, the requested survey information will be submitted to the CNDDDB as stipulated in the City's Biology Guidelines. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft PEIR. Therefore, no further response is warranted.

S2-27: This comment advises that environmental document filing fees will be required. The City will pay CDFW filing fees upon project approval and filing of the Notice of Determination as required by CEQA. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft PEIR. Therefore, no further response is warranted.

Jordan Moore
City of San Diego
April 20, 2023
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S2-28
cont.

Questions and further coordination on terrestrial issues should be directed to Jessie Lane, Environmental Scientist, at Jessie.Lane@wildlife.ca.gov. Questions and further coordination on marine issues should be directed to Leslie Hart, Marine Environmental Scientist, at Leslie.Hart@wildlife.ca.gov.

Sincerely,



David Mayer
Environmental Program Manager
South Coast Region

cc: California Department of Fish and Wildlife
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Jennifer Turner, San Diego – Jennifer.Turner@wildlife.ca.gov
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City of San Diego
CEQA Planning, San Diego – PlanningCEQA@sandiego.gov

Attachments

- S2-29 | Attachment A: DPEIR Alternatives Analysis Figures and Tables Summary
- S2-30 | Attachment B: CDFW Draft Mitigation, Monitoring, and Reporting Plan and Associated Recommendations
- S2-31 | Attachment C: CDFW Comments on the De Anza Revitalization Plan, December 13, 2016.
- S2-32 | Attachment D: CDFW Comments on the Notice of Preparation of a Draft Program Environmental Impact Report for the Mission Bay Park Master Plan Update-Fiesta Island, June 8, 2017.
- S2-33 | Attachment E: CDFW Comments on the De Anza Cove Amendment to the Mission Bay Park Master Plan NOP, July 10, 2018.
- S2-34 | Attachment F: CDFW Comments on the De Anza Natural Project NOP, February 10, 2022.

S2-28: This comment includes the commenter's name, role, and contact information. This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is warranted.

S2-29: This comment is an attachment to the comment letter that provides a summary of the Draft PEIR proposed Alternatives. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. No further response is warranted.

S2-30: This comment is an attachment to the comment letter that provides a summary of the recommendations and revised mitigation measures in the comment letter. Refer to response to comments above.

S2-31: This comment is an attachment to the comment letter that provides the CDFW's comments on the De Anza Revitalization Plan dated December 13, 2016. This plan was a previous iteration of the De Anza Natural Amendment. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. No further response is warranted.

S2-32: This comment is an attachment to the comment letter that provides the CDFW's comments on the Notice of Preparation (NOP) of a Draft PEIR for the Mission Bay Park Master Plan Update – Fiesta Island dated June 8, 2017. This is a separate project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. No further response is warranted.

References

- Allen, W. H. 1994. Reintroduction of endangered plants: biologists worry that mitigation may be considered an easy option in the political and legal frameworks of conservation. *Bioscience* 44(2): 65-8.
- California Department of Fish and Wildlife (CDFW). February 10, 2022. Comments on the Notice of Preparation of a Program Environmental Impact Report for De Anza Natural (Amendment to the Mission Bay Park Master Plan)
- California Department of Fish and Wildlife (CDFW). December 13, 2016. Comments on the De Anza Revitalization Plan.
- California Department of Fish and Wildlife (CDFW). June 8, 2017. Comments on the Notice of Preparation of a Draft Program Environmental Impact Report for the Mission Bay Park Master Plan Update-Fiesta Island.
- California Department of Fish and Wildlife (CDFW). July 10, 2018. Comments on the De Anza Cove Amendment to the Mission Bay Park Master Plan NOP.
- California Native Plant Society Rare Plant Scientific Advisory Committee. 1991. Mitigation Guidelines Regarding Impacts to Rare, Threatened and Endangered Plants. California Native Plant Society, Sacramento, CA.
- California Regional Water Quality Control Board. July 2020. In the matter of City of San Diego, January 2016 Sanitary Sewer Overflow, Tecolote Creek, Mission Bay, CA. Settlement Agreement and Stipulation for Entry of Administrative Civil Liability, Order No. R9-2020-0150, Place ID 631631.
- California Regional Water Quality Control Board. June 2020. Revised Project Application Form, Northeast Mission Bay Wetland Restoration.
- City of San Diego. May 1990. Final Mission Bay Park Natural Resource Management Plan. Prepared for the Park and Recreation Department by the Development and Environmental Planning, Planning Department, City of San Diego.
- City of San Diego. 2002. Mission Bay Park Master Plan Update, City of San Diego, Amended July 9, 2002.
- City of San Diego. 2012. San Diego Municipal Code Land Development Code—Biology Guidelines. Amended April 23, 2012.
- City of San Diego. 2015. Climate Action Plan. https://www.sandiego.gov/sites/default/files/final_july_2016_cap.pdf
- City of San Diego. 2016. De Anza Revitalization Plan. <http://www.deanzarevitalizationplan.com/>
- City of San Diego. 2019. San Diego Municipal Code. Code Publishing Company.

S2-33: This comment is an attachment to the comment letter that provides the CDFW's comments on the De Anza Cove Amendment to the Mission Bay Park Master Plan NOP dated July 10, 2018. As discussed in PEIR Chapter 1.0, Introduction, in June 2018, the City initiated a Draft PEIR (2018 Draft PEIR) process for the Mission Bay Park Master Plan and released the NOP. Preliminary analyses were performed based on the 2018 proposed land use plan (2018 Proposal); however, the 2018 Draft PEIR was never circulated for public review. Based on feedback on the Mission Bay Park Master Plan since the original 2018 NOP was released, the City modified the project in 2022 to fine tune the land uses and increase preservation of natural resources. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. No further response is warranted.

S2-34: This comment is an attachment to the comment letter that provides the CDFW's comments on the De Anza Natural Project NOP dated February 10, 2022. The purpose of the NOP is to obtain early comments on the project, alternatives, and potential environmental impacts. All comment letters received during the formal NOP public comment period and comments made during the scoping meeting were included as Appendix A, Notice of Preparation and Scoping Comments, of the PEIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. No further response is warranted.

City of San Diego. 2019. State Lands Sea Level Rise Vulnerability Assessment.

City of San Diego. 2020. Climate Change Vulnerability Assessment.

Fiedler, P. L. 1991. Final report: mitigation-related transplantation, relocation and reintroduction projects involving endangered and threatened, and rare plant species in California. San Francisco State University, San Francisco, California, USA.

Howald, A.M. Translocation as a mitigation strategy: lessons from California. In: D.A. Falk, C.I. Millar, and M. Olwell eds. *Restoring Diversity: Strategies for Reintroduction of Endangered Plants*. Island Press, Washington, DC

Neckles, Hilary A., et al. "Classification of Tidal Marshes and Estuarine Habitats on the Atlantic Coast of the U.S." *Northeastern Naturalist* 9(4): 383-398.

NOAA (National Oceanic and Atmospheric Administration) Fisheries, West Coast Region. 2014. *California Eelgrass Mitigation Policy and Implementing Guidelines*.

Attachment A:

DPEIR Alternatives Analysis Figures and Tables Summary

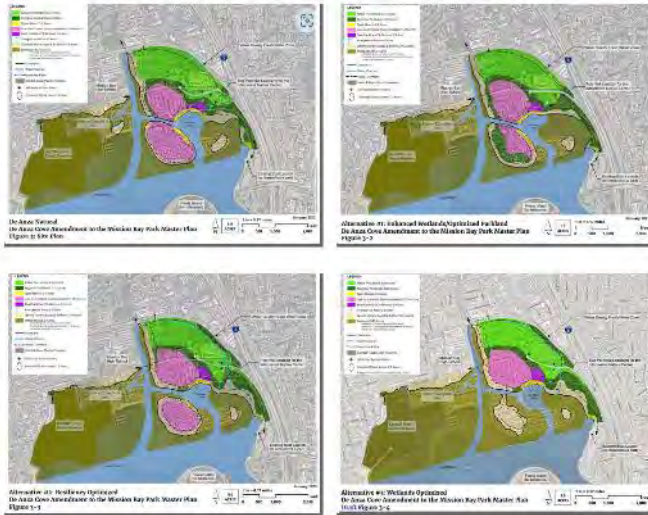


Table S-2: Proposed Land Use Averages

Land Use	Acres
Regional Park/Open Space	61.9
Expanded Market/Industrial	141.9
Expanded Market (Park, Regional Office Area)	27.6
Local-Cost-Via-Tax (Regional Office Area)	48.5
Regional Parkland	28.3
Open Space/Other (Park/Open Space)	2.8
Regional Office Center (T Location)	—
Active Recreation	2.1
Open Space	60.9
Open Beach	9.6
Road	—
Total	361.9

Note: 1. This table is a summary of the proposed project's land use averages. It is not intended to be a detailed breakdown of the project's land use. 2. The land use averages are based on the project's total area of 361.9 acres. 3. The land use averages are based on the project's total area of 361.9 acres. 4. The land use averages are based on the project's total area of 361.9 acres. 5. The land use averages are based on the project's total area of 361.9 acres.

Table S-2: Comparison of Wetland/Optional Parkland Alternative to the Proposed Project

Land Use	Wetland/Optional Parkland Alternative (Acres)	Proposed Project (Acres)
Regional Park/Open Space	150.9	61.9
Expanded Market/Industrial	141.9	141.9
Expanded Market (Park, Regional Office Area)	27.6	27.6
Local-Cost-Via-Tax (Regional Office Area)	48.5	48.5
Regional Parkland	43	28.3
Open Space/Other (Park/Open Space)	2.8	2.8
Regional Office Center (T Location)	—	—
Active Recreation	2.1	2.1
Open Space	60.9	60.9
Open Beach	9.6	9.6
Road	—	—
Total	361.9	361.9

Note: 1. This table is a comparison of the proposed project's land use averages to the land use averages of the Wetland/Optional Parkland Alternative. 2. The land use averages are based on the project's total area of 361.9 acres. 3. The land use averages are based on the project's total area of 361.9 acres. 4. The land use averages are based on the project's total area of 361.9 acres. 5. The land use averages are based on the project's total area of 361.9 acres.

Table S-3: Comparison of Wetland/Optional Alternative to the Proposed Project

Land Use	Wetland/Optional Alternative (Acres)	Proposed Project (Acres)
Regional Park/Open Space	61.9	61.9
Expanded Market/Industrial	141.9	141.9
Expanded Market (Park, Regional Office Area)	27.6	27.6
Local-Cost-Via-Tax (Regional Office Area)	48.5	48.5
Regional Parkland	28.3	28.3
Open Space/Other (Park/Open Space)	2.8	2.8
Regional Office Center (T Location)	—	—
Active Recreation	2.1	2.1
Open Space	60.9	60.9
Open Beach	9.6	9.6
Road	—	—
Total	361.9	361.9

Note: 1. This table is a comparison of the proposed project's land use averages to the land use averages of the Wetland/Optional Alternative. 2. The land use averages are based on the project's total area of 361.9 acres. 3. The land use averages are based on the project's total area of 361.9 acres. 4. The land use averages are based on the project's total area of 361.9 acres. 5. The land use averages are based on the project's total area of 361.9 acres.

Table S-3: Comparison of Resiliency Optimized Alternative to the Proposed Project

Land Use	Resiliency Optimized Alternative (Acres)	Proposed Project (Acres)
Regional Park/Open Space	61.9	61.9
Expanded Market/Industrial	141.9	141.9
Expanded Market (Park, Regional Office Area)	27.6	27.6
Local-Cost-Via-Tax (Regional Office Area)	48.5	48.5
Regional Parkland	28.3	28.3
Open Space/Other (Park/Open Space)	2.8	2.8
Regional Office Center (T Location)	—	—
Active Recreation	2.1	2.1
Open Space	60.9	60.9
Open Beach	9.6	9.6
Road	—	—
Total	361.9	361.9

Note: 1. This table is a comparison of the proposed project's land use averages to the land use averages of the Resiliency Optimized Alternative. 2. The land use averages are based on the project's total area of 361.9 acres. 3. The land use averages are based on the project's total area of 361.9 acres. 4. The land use averages are based on the project's total area of 361.9 acres. 5. The land use averages are based on the project's total area of 361.9 acres.

Attachment B:

CDFW Draft Mitigation, Monitoring, and Reporting Plan and Associated Recommendations

	Recommendation (Rec.)/Mitigation Measures (MM)	Timing	Responsible Party
Rec. 1	For aspects of the proposed Project that have not been fully studied, findings of significance shall be set aside when certifying the PEIR until those aspects can be fully studied in a subsequent or supplemental CEQA document (see CEQA Guidelines §§ 15162 and 15163).	Before certification of Final PEIR	City of San Diego
Rec. 2	The Final PEIR, or a subsequent CEQA document, should provide specific details of the habitat types in the proposed wetland and marshland creation areas. Acreages for each habitat type such as open water, mudflat, low saltmarsh, mid-high saltmarsh, transitional habitat, and upland habitat should be identified. A summary table and detailed map should be included.	Before certification of Final PEIR	City of San Diego
Rec. 3	The Project design should include resilient marsh habitats that can adapt to changing sea levels. Transitional habitat, buffer zones, and climate-resilient elevation gradients should be incorporated. The PEIR should include an analysis of habitat changes and adaptations over time in response to rising sea levels, projected out to 2100, based on current climate models. Additionally, the Project Alternatives should consider the effects of potential sea level rise and climate change on marine habitat modifications, created wetlands, and created upland habitat, based on climate modeling and the City's Climate Change Vulnerability Assessment. Analysis should include discussion of infrastructure and long-term maintenance, type conversion of habitats, and describe how the Project is congruent with the Climate Resilient SD Plan.	Before certification of Final PEIR	City of San Diego
Rec. 4	The Wetlands Optimized Alternative shall be further analyzed to demonstrate how 80 acres of additional functional wetland will remain in 2100, given sea level rise under current climate projections, to satisfy the requirements of the SEP funding. Additionally, to meet the SEP requirement to, "...maximize implementable wetland restoration reflective of existing feasibility studies for Mission Bay," the alternative should incorporate feasible design elements that were studied as a component of Audubon's ReWild Mission Bay. We continue to encourage the City to incorporate native habitat along the entire De Anza peninsula. Foremost in consideration should be the extent to which the SSA can contribute to the Park's [Mission Bay Park] water quality.	Before certification of Final PEIR	City of San Diego

	Given the range of alternatives analyzed in the DPEIR, CDFW supports the Wetlands Optimized Alternative, as it maximizes wetland restoration along the De Anza Boot.		
Rec. 5	<p>CDFW recommends using a vibratory hammer for pile driving to the greatest extent feasible, or an alternative technology that produces the least amount of noise. If an impact hammer must be used (e.g., due to pile material, refusal at bedrock) as the Pre-Construction Hydroacoustic Study mitigation measure (MM BIO 5.3-6) proposes, multiple minimization measures are needed to reduce sound levels. CDFW recommends the following:</p> <ul style="list-style-type: none"> • A wood, or similar material, cushion block should be used between the pile and hammer during all pile driving using an impact hammer. • To further reduce hydroacoustic impacts to fish and marine mammals, a bubble curtain should be used to the greatest extent feasible during all impact pile driving to reduce sound below levels that have been shown to cause injury and/or mortality. • A sound attenuation and monitoring plan should be submitted to the resource agencies for review and approval prior to initiating pile driving activities. 	Before certification of Final PEIR	City of San Diego
Rec. 6	<p>Potential impacts to marine fish and invertebrate species, including both commercially and recreationally important species, should be identified and analyzed in the Final PEIR. Any significant impacts to marine fish and invertebrate species should be disclosed in the Final PEIR and avoided and minimized to below a level of significance. A list and description of fish species in the Bay may be found on Marine Bios (https://wildlife.ca.gov/Conservation/Marine/GIS/MarineBIOB). Fish and invertebrate species which should be addressed include but are not limited to:</p> <ul style="list-style-type: none"> • California spiny lobster (<i>Panulirus interruptus</i>) • California halibut (<i>Paralichthys californicus</i>) • Leopard shark (<i>Triakis semifasciata</i>) • Barred sand bass (<i>Paralabrax nebulifer</i>) • Spotted sand bass (<i>Paralabrax maculatofasciatus</i>) • Calico bass (<i>Paralabrax clathratus</i>) • Black croaker (<i>Chelotrema saturnum</i>) • Yellowfin croaker (<i>Umbra roncadon</i>) • Spottin croaker (<i>Roncador stearnsi</i>) • White croaker (<i>Genyonemus lineatus</i>) • California corbina (<i>Menticirrhus undulatus</i>) • Shoelnose guitarfish (<i>Rhinobatos productus</i>) • Shortfin corvina (<i>Cynoscion parvipinnis</i>) 	Before certification of Final PEIR	City of San Diego

MM 1	<p>The final PEIR shall provide evidence (e.g. scientific literature, monitoring reports documenting species-specific transplantation success) that the proposed mitigation will be feasible. The Conceptual Planting Plan and Long-term Maintenance and Preservation Plan shall be prepared by a biologist with expertise in southern California ecosystems and native plant restoration techniques and submitted to the Wildlife Agencies for review and approval prior to implementation. The Plans shall discuss the following, at a minimum: 1) species-specific planting (i.e. container or seed) methods; 2) species-specific measurable goals and success criteria (e.g. number of individuals, percent survival rate, absolute cover) for establishing self-sustaining populations; 3) long-term monitoring; 4) location of transplantation/restoration sites and assessment of appropriate reference sites; 5) a description of the irrigation methodology; 6) measures to control exotic vegetation; 7) contingency measures, should the success criteria not be met; and 8) conservation of the mitigation site in perpetuity. The Long-term Maintenance and Preservation Plan shall specify how it will be implemented, who the responsible party for overseeing the implementation is, and when it will be approved. Further coordination with USFWS may be necessary to ensure that proposed mitigation for the ESA-listed California seabird is adequate.</p>	Before certification of Final PEIR	City of San Diego
MM 2	<p>The following protocol shall be incorporated into the PEIR:</p> <ol style="list-style-type: none"> 1. An initial bat survey shall be conducted by a qualified bat biologist during the maternity season (March 1 to August 31) to confirm if any maternity colonies have been established within the Project site. Survey protocol should include a combination of suitable habitat inspection and sampling, as well as at least one evening emergence and acoustic survey. Any ground disturbance or removal of vegetation/suitable roosting habitat should be conducted no more than three days after pre-construction surveys are completed. Furthermore, eviction of any bats found day-roosting during the maternity season should be avoided. 2. If an active roost is identified during maternity season, CDFW requests the opportunity to review any mitigation and exclusion plans for concurrence prior to implementation. Removal of the roost should only occur outside of the maternity season, when the mitigation plan has been approved by CDFW, and only when bats are not present in the roost. The mitigation plan should detail the methods of excluding bats from the roost and the plans for a replacement roost in the vicinity of the Project site. 	Before certification of Final PEIR	City of San Diego

	<p>The plan shall include: (a) a description of the species targeted for mitigation; (b) a description of the existing roost or roost sites; (c) methods to be used to exclude the bats if necessary; (d) methods to be used to secure the existing roost site to prevent its reuse prior to removal; (e) the location for a replacement roost structure; (f) design details for the construction of the replacement roost; (g) monitoring protocols for assessing replacement roost use; (h) a schedule for excluding bats, demolishing of the existing roost, and construction of the replacement roost; and (i) contingency measures to be implemented if the replacement roosts do not function as designed.</p> <p>3. If special-status bat species or a maternity roost of any bat species is present, but no direct removal of active roosts will occur, specific avoidance measures should be determined by the bat biologist, which may include implementation of a construction-free buffer around the active roost. Combustion equipment such as generators, pumps, and vehicles should not be parked or operated under or adjacent to the roost habitat. Vibration and noise should be avoided, and personnel should not be present directly under the colony.</p> <p>4. If the pre-construction survey determines that no active roosts are present, then trees/suitable habitat should be removed within three days following the pre-construction survey. All potential roost trees should be removed in a manner approved by a qualified bat biologist, which may include presence of a biological monitor. Additionally, all construction activity in the vicinity of an active roost should be limited to daylight hours.</p>		
MM 3	<p>All mitigation for eelgrass impacts shall be in-kind mitigation in Mission Bay to the greatest extent feasible.</p> <p>Contaminated or high silt and organic content sediments shall not be placed in the marine environment that are not compatible with existing native sediment. CDFW recommends using compatible sediments when placing fill material in Mission Bay.</p> <p>Plans shall be developed to avoid and minimize potential impacts to eelgrass to the maximum extent feasible, since eelgrass beds or patches are identified within or adjacent to the Project area. The proposed Project shall avoid and minimize disturbance and damage or losses to eelgrass beds from placement of material fill, pile driving, potential shading from construction activities or new structures, and from associated barges and vessels to the maximum extent feasible. Impacts to avoid and minimize may include, at a</p>	Before certification of Final PEIR	City of San Diego

<p>minimum, barge shading and anchoring within eelgrass habitat, pile driving and pile pulling bottom disturbances, demolition and construction turbidity, sedimentation, and falling debris. CDFW recommends the following should eelgrass beds or patches be identified within or adjacent to the Project area:</p> <ul style="list-style-type: none"> • To avoid direct eelgrass impacts, locate pile driver barges and vessels and all barge anchoring outside of eelgrass habitat. • To avoid scouring of eelgrass and potential eelgrass habitat, anchor chain designs, and locations of barge and vessel moorings shall avoid eelgrass habitat impacts. • To avoid and minimize eelgrass impacts from demolition and construction debris, the City of San Diego shall use Best Management Practices (BMPs) such as perimeter debris booms. If debris is observed falling into the Mission Bay water, retrieve debris as soon as possible. • To minimize eelgrass impacts from water turbidity and sedimentation, install silt curtains around pile driving or demolition areas if applicable. Restrict the turbidity plumes to the smallest possible area during all phases of in-water construction. <p>If eelgrass habitat is identified in the Project area, comprehensive pre- and post-construction surveys for eelgrass beds or patches shall be conducted consistent with the CEMP and a map of the existing eelgrass wetland habitat shall be provided in the Final PEIR. If any unavoidable eelgrass impacts occur, these impacts shall be compensated using guidance described within the CEMP. Indirect eelgrass impacts such as shading from new piles shall also be avoided. Since pile driving work conducted outside of the peak eelgrass growing period may reduce shading impacts when eelgrass beds may have died back, pile location and time of year for pile driving shall be considered to avoid eelgrass and other fish and wildlife impacts generated by pile driving. If expected eelgrass losses are unavoidable, the City of San Diego shall use guidance from the CEMP to compensate for the losses. Final eelgrass losses shall be determined after construction and eelgrass impact monitoring surveys are complete. Draft pre-construction eelgrass Mitigation, Monitoring and Reporting Plans (Plan) shall be developed in consultation with CDFW and other permitting and resources agencies. Minimum Plan elements shall include:</p> <ul style="list-style-type: none"> • Prior to construction, a draft mitigation Plan shall be developed based on updated eelgrass surveys. The Plan 		
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	<p>shall be finalized along with the final eelgrass impacts analysis once post-construction and impacts monitoring surveys are completed.</p> <ul style="list-style-type: none"> • The Plan shall include a summary of eelgrass habitat impacts. The summary shall include conservation measures for eelgrass avoidance, minimization, and eelgrass compensatory mitigation if necessary. • If compensatory mitigation is required for eelgrass impacts, mitigation ratios shall be determined, at a minimum, in accordance with the CEMP, and as recommended by CDFW and other agencies. • The Plan shall identify CDFW as an agency to receive and review draft and final eelgrass mitigation and monitoring reports, surveys, and plans. • If eelgrass harvesting and transplanting is proposed, healthy eelgrass donor sites shall be identified during preliminary eelgrass impact surveys or during separate pre-harvest eelgrass donor site surveys. <p>If eelgrass harvest and transplanting is required for mitigation, a Scientific Collecting Permit (SCP) from CDFW will be required prior to harvest and transplanting activities. The SCP may include permit conditions such as donor eelgrass surveys, submittal of an eelgrass harvest and transplant plan, limits on number of turions collected, methods for collection and transplanting, notification of activities, and reporting requirements. Please visit CDFW's SCP webpage for more information: https://wildlife.ca.gov/Licensing/Scientific-Collecting.</p> <p>An eelgrass mitigation site is located just south of the Project footprint. The mitigation site was created to mitigate for eelgrass impacts related to the Mission Bay Navigational Channel Dredging Project completed three years ago. This eelgrass mitigation site shall be identified and addressed in the Final PEIR. Avoidance and minimization measures shall be proposed for the eelgrass mitigation site.</p>		
Rec. 7	<p>Development of trails within native habitat areas should be analyzed within the PEIR for potential habitat edge effects. Trail and path development footprints should be excluded from acreage calculations for upland habitat. Recreational activities in wetlands should be limited only to activities that will not disturb wildlife, particularly special-status birds, or activities for scientific/education purposes. The PEIR should discuss what activities will be allowed, what areas will be open for public access as opposed to activities more limited in their occurrence as may be allowed by special approval by the City, and how regulations will be enforced.</p>	<p>Before certification of Final PEIR</p>	<p>City of San Diego</p>

Rec. 8	The PEIR should analyze the proposed low-cost guest housing and RV use on the De Anza peninsula as an active recreational use and discuss how surrounding natural habitat will be impacted. To maximize habitat values and improve water quality, commercial and other land use developments should be strategically located farthest away from sensitive resources to include wetlands and open waters.	Before certification of Final PEIR	City of San Diego
Rec. 9	The DPEIR should elaborate on the specific buffers/safety measures that will delineate the non-motorized boat use area and include discussion on what measures will be taken to ensure that motorized watercraft do not enter De Anza Cove.	Before certification of Final PEIR	City of San Diego
Rec. 10	To ensure consistency with the MSCP's conservation goals and objectives, the Final PEIR should provide full disclosure and functional equivalency analysis of the proposed BLA per Sections 1.1.1 and 5.42 of the MSCP SAP (City of San Diego 1997). The Wildlife Agencies will need to agree and provide written concurrence for the requested BLA after we have had the opportunity to review all information provided by the City. When evaluating a proposed BLA and habitat equivalency assessment, the Wildlife Agencies generally consider the following biological goals: <ul style="list-style-type: none"> • No net loss of MHPA acreage; • No net reduction of higher sensitivity vegetation communities (i.e., Tier I, II, IIIa and IIIb); • Not impacts/conservation of covered listed species resulting from the BLA; • Not impacts/conservation of covered non-listed sensitive species resulting from the BLA; and • Landscape configuration to minimize edge effects and maintain connectivity of the MHPA (i.e., net effects to 'Preserve Design'). 	Before certification of Final PEIR	City of San Diego
Rec. 11	Table 2-5 in the DPEIR should be updated to include CDFW on the list of jurisdictional agencies, for consistency with Table 10 in the BRTR. We additionally look forward to further consultation with the City regarding submittal of a streambed notification package to the Lake and Streambed Alteration Program, per Fish and Game Code section 1600 <i>et seq.</i> , particularly for aspects of the Project that will occur in Rose Creek.	Before certification of Final PEIR	City of San Diego
Rec. 12	Any future plans should detail the success criteria of the habitat creation/restoration components of the Project, discuss how they will be preserved in perpetuity, and indemnify their success through financial surties. CDFW recommends that any plans relating to habitat design elements or mitigation aspects of the Project be developed in coordination with, and be subject to review and approval by, the Wildlife Agencies.	Before impacts	City of San Diego

<p>Rec. 13</p>	<p>Without a scientifically based statewide artificial reef plan for California, CDFW does not recommend any new artificial reef or artificial habitat at this time, regardless of intent. CDFW recommends providing additional discussion within the Final PEIR as to why the treatment would be necessary to achieve the goal to improve water quality. In addition, CDFW recommends including alternatives to the constructed oyster beds that could still achieve similar shoreline protection goals.</p> <p>CDFW is concerned artificial reefs and habitat creation could attract invasive species. If the constructed oyster beds are implemented as currently described within the Draft PEIR, CDFW recommends that the Final PEIR include discussion on developing an invasive species monitoring plan that includes monitoring measures, adaptive management measures, and protocols if invasive species are identified.</p> <p>Additionally, CDFW is concerned that placement of the constructed oyster beds would potentially decrease the amount of habitat for further eelgrass expansion. CDFW recommends the Final PEIR include additional discussion on whether the installation of the oyster beds would be within current and/or future eelgrass habitat and whether it could prevent future expansion of eelgrass if it were to be implemented.</p>	<p>Before certification of Final PEIR</p>	<p>City of San Diego</p>
<p>Rec. 14</p>	<p>CDFW recommends including a mitigation measure detailing a pre-construction Caulerpa spp. survey to identify potential existence of invasive Caulerpa spp. as described in the Caulerpa Control Protocol https://www.fisheries.noaa.gov/west-coast/habitat-conservation/aquaticinvasive-species-west-coast. If Caulerpa spp. are found, do not disturb the species and contact CDFW and National Marine Fisheries Service within 24 hours as described in the Caulerpa Control Protocol.</p>	<p>Before certification of Final PEIR</p>	<p>City of San Diego</p>
<p>Rec. 15</p>	<p>CDFW recommends an analysis of the potential piles or rock that would be involved in the existing boat ramp removal construction in the Final PEIR. If no further analysis is done, CDFW assumes the analysis will be done in subsequent CEQA documents.</p>	<p>Before certification of Final PEIR</p>	<p>City of San Diego</p>
<p>Rec. 16</p>	<p>Future site-specific analysis should ensure that impacts to species designated as Fully Protected (FP), regardless of their status as covered species under the MSCP SAP, must be completely avoided. FP species may not be taken or possessed at any time per § 3511 of the Fish and Game Code. Avoidance measures for avian species may include phasing construction to occur outside of nesting season, conducting species-specific surveys when construction will occur within 500' of a nesting site, retaining a qualified</p>	<p>Before impacts</p>	<p>City of San Diego</p>

	biological monitor on-site during construction, and implementation of no-activity buffers around active nests.		
Rec. 17	If any site-specific elements of the Project will result in take of a species designated as endangered or threatened, or as a candidate for listing under CESA, unless covered by the City's SAP permit, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and G. Code §§ 2080.1, 2081, subds. (b), (c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.	Before impacts	City of San Diego



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December 13, 2016

Mr. Craig Hooker
Project Manager
City of San Diego, Park Planning, Planning Department
1010 2nd Avenue, MS413
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CHooker@sandiego.gov

Subject: Comments on the De Anza Revitalization Plan, City of San Diego, San Diego County, California

Dear Mr. Hooker:

The Department of Fish and Wildlife (Department) has had an opportunity to review the City of San Diego's (City) De Anza Revitalization Plan (Revitalization Plan) and the three Concept Alternatives presented during the November 7, 2016, Community Workshop No. 3 in addition to comments on the Revitalization Plan provided by the U.S. Fish and Wildlife Service (Service) and the California Coastal Conservancy (Coastal Conservancy). We appreciate the City granting the Department an extension to provide preliminary comments on the Revitalization Plan in an email dated December 5, 2016. The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15385) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City of San Diego (City) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP).

With the proposed Revitalization Plan, the City intends to repurpose and revitalize the De Anza project area. The City proposes to work with the community and stakeholders to develop Revitalization Plan alternatives that result in selecting a preferred plan and an amendment to the Mission Bay Park Master Plan and Environmental Impact Report. The Revitalization Plan includes the De Anza Special Study Area (as identified in the Mission Bay Park Master Plan), the De Anza Cove Park, and the land along North Mission Bay Drive, extending north to Grand Avenue and easterly to Mission Bay Boulevard.

The Department offers the following comments and recommendations to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources.

The California Fish and Game Commission has adopted a Wetlands Resources Policy (Commission Policy) which, in part, acknowledges that "California's remaining wetlands provide significant and essential habitat for a wide variety of important resident and migratory fish and wildlife species." In recognition of the importance of wetlands to the State of California, the Commission Policy establishes that "...the protection, preservation, restoration, enhancement and expansion of wetlands as migratory bird breeding and wintering habitat are justly

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recognized as being critical to the long-term survival of such species' concluding that "... it is the policy of the Fish and Game Commission to seek to provide for the protection, preservation, restoration, enhancement and *expansion* [emphasis added] of wetland habitat in California." In addition to the Commission Policy, the Department administers the NCCP, the Final Regional Plan for the Multiple Species Conservation Program (MSCP) umbrella plan and the City of San Diego's Subarea Plan (SAP), all of which acknowledge the importance and protection of wetlands. The Department is therefore tasked with seeking opportunities to enhance and expand wetlands resources. The following recommendations are provided to assist the City in minimizing potential biological effects associated with the proposed project while also maximizing wetland creation and enhancement—a common theme among the Commission Policy, the NCCP, and the guidance found within multiple City planning documents.

In accordance with the 2002 Mission Bay Park Master Plan Update, the regional constituents expressed strong interest in Mission Bay Park with particular focus given to recreational opportunities and the quality of the natural environment. "In recognition of this generation's increasing attention towards environmental issues, and of the region's concern over the quality of the Bay's natural environment in particular, this Plan [i.e., Mission Bay Park Master Plan] incorporates a decisive commitment to environmental health. This commitment is supported by comprehensive proposals aimed at improving the Bay's water quality and continuing the conservation and enhancement of the Park's wetland and upland habitats for the benefit of both wildlife and people. Key environmental recommendations include the establishment of an 80-acre wetland area at the outfall of Rose Creek, and the creation of an overflow parking lot in South Shores. If properly designed, the wetland will help filter pollutants entering the Bay through Rose Creek, which drains a 58-square mile area, provide increased habitat for wildlife along the Pacific Coast Flyway, and provide the setting for nature-oriented recreational activities such as bird-watching and canoeing (City 2002, p. 3)."

The marsh habitat associated with the Northern Wildlife Preserve (including the Kendall-Frost Reserve) is valued not only as a prime example of coastal salt marsh and an important regional resting, feeding, and migratory stop within the Pacific Flyway, but also as a significant bioremediation tool to improve water quality—a key focus of the Mission Bay Park Master Plan and the Mission Bay Natural Resources Management Plan (City of San Diego, 2002 and 1990 respectively). The City's planning documents have long recognized the mutual benefits that improved water quality offer public recreation and habitat values in specifically stating that the De Anza Special Study Area (SSA) "... shall not be developed to the detriment of existing and/or future adjacent habitat areas. Foremost in consideration should be the extent to which the SSA can contribute to the Park's [Mission Bay Park] water quality. In fact, additional wetlands creation *must be considered* [emphasis added] as part of the SSA." (City, 2002, p. 53).

In light of the habitat, water quality, and subsequent recreation improvements detailed above, the Department recommends that the City revise the Revitalization Plan's range of concept alternatives to incorporate native habitats extending from the existing marsh (Kendall-Frost) and at a minimum continuing to the far side of Rose Creek, if not the entirety of De Anza peninsula. We recommend that concept alternatives focus on providing large contiguous blocks of wetland and upland habitat rather than the narrow bands of habitat currently proposed in all three concept alternatives. These alternatives should utilize the ReWild Mission Bay Alternatives when developing concept alternatives for the Revitalization Project.

Mr. Craig Hooker
City of San Diego, Park Planning, Planning Department
December 13, 2016
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As a component of exploring the expansion of the current wetlands associated with the Northern Wildlife Preserve and the Kendall-Frost Marsh Reserve, the City should analyze the potential to commit the approximately 24-acre Campland Recreational Vehicle (RV) Park for future habitat creation following the expiration of its 2017 lease. In accordance with the Mission Bay Natural Resources Management Plan "[t]he restoration of the Rose Creek/Northern Wildlife preservation should be part of a resource management program submitted..." and "[a] determination concerning the addition of Campland to the Northern Wildlife Preserve and excavation of the site to allow marsh reestablishment, should be part of this program (City, 1990)."

To maximize habitat values and improve water quality, we recommend that commercial and other land use developments not directly dependent on bay access be strategically located furthest away from the most sensitive resources to include wetlands, and open waters of the bay.

Furthermore, as identified by the Coastal Conservancy and the Service, the current concept alternatives do not appreciably anticipate sea level rise. The Department is similarly concerned with the limited analysis provided for sea level rise and therefore recommends that each concept alternative incorporate climate resiliency within both planning and design aspects of the Revitalization Plan. Several climate change models indicate that areas of De Anza will be subject to sea level rise suggesting that absent major structural infrastructure, the redevelopment of De Anza may be in jeopardy.

We appreciate the opportunity to comment on the De Anza Redevelopment Plan. Questions regarding this letter and further coordination on these issues should be directed to Eric Weiss at (858-467-4266), or eric.weiss@wildlife.ca.gov.

Sincerely,



Gail K. Sevrens
Environmental Program Manager

cc: State Clearinghouse, Sacramento
Carolyn Lieberman, U.S. Fish and Wildlife Service, Carlsbad

References

City of San Diego, May 1990. Final Mission Bay Park Natural Resources Management Plan. Prepared for the Park and Recreation Department by the Development and Environmental Planning, Planning Department, City of San Diego.

City of San Diego, March 1997. Multiple Species Conservation Program, City of San Diego Subarea Plan. City of San Diego Community and Economic Development Department.

City of San Diego, August 1998. Final Regional Plan for the Multiple Species Conservation Program.

City of San Diego, 2002. Mission Bay Park Master Plan Update, City of San Diego, Amended July 9, 2002.



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June 8, 2017

Rebecca Malone, Environmental Planner
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PlanningCEQA@sandiego.gov

Subject: Comments on the Notice of Preparation of a Draft Program Environmental Impact Report for the Mission Bay Park Master Plan Update—Fiesta Island Amendment, SCH# 2017051034

Dear Ms. Malone:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) for the Mission Bay Park Master Plan Update—Fiesta Island (proposed project) Draft Programmatic Environmental Impact Report (PDEIR).

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the proposed project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the proposed project that the Department, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

Department Role

The Department is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070, California Environmental Quality Act [CEQA] Guidelines § 15386, subd. (a).) The Department, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, the Department is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

The Department is also a Responsible Agency under CEQA. (Pub. Resources Code, § 21069, CEQA Guidelines, § 15381.) The Department may need to exercise regulatory authority as provided by the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) program. The City of San Diego (City) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP).

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Project Location

The proposed project is located on Fiesta Island, within the Mission Bay Park Master Plan, in the City of San Diego. Access to Fiesta Island is provided by a single causeway connecting Fiesta Island Road to East Mission Bay Drive.

Project Description/Objective

The proposed project would amend the existing Mission Bay Park Master Plan specifically incorporating the City's Concept Plan (Concept Plan) for the approximately 425-acre Fiesta Island. The City's Concept Plan identifies areas for developed park land, swimming areas, youth camping, primitive camping, an Over the Line sand arena, concessions, special event recreational vehicle parking, and launch areas for personal watercraft. The City's Concept Plan also identifies environmental areas including upland habitat, California least tern (*Sterna antillarum brownii*; least tern) preserves, salt pans, marsh land, eelgrass (*Zostera marina*) beds, and native landscaping. The Concept Plan includes extending Fiesta Island Road along Hidden Anchorage cove, swimming opportunities in the channel south of the island, developed parkland, a playground and restrooms, and increased pedestrian access to interior portions of the island.

The proposed project identifies two Options, Option A and Option B. Option A proposes to extend Fiesta Island Road south of Hidden Anchorage to access a parking area, picnic tables, paddling facility/storage, pier, ramp and floating dock, a designated swimming beach area, and developed park with a children's play area and restroom, while providing for habitat areas. This option will also provide for a dog special event area that includes an obstacle course, a dog competition area, and restrooms, for a total of approximately 87 acres of dog off-leash use within this southwest area. Option B supports a parking area that will not extend as far as Option A, and will provide for a view pavilion and view plaza; picnic tables; running trail; maintenance/emergency trail, habitat areas; and dog off leash non-native vegetation play areas, for a total of approximately 93 acres of dog off leash use within this southwest area.

We offer the following comments and recommendations to assist the City in adequately identifying, avoiding, minimizing, and/or mitigating the proposed project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

Specific Comments

- f) Mission Bay (Bay) has approximately 2,300 acres of mostly shallow water bay habitat and includes 27 miles of mostly unarmored shoreline. Eelgrass habitat has expanded over much of the Bay floor and currently provides one of the most abundant and unique fish nursery habitats of the Bay ecosystem (Merkel and Associates, 2016). Additionally, the shallow subtidal, intertidal, salt marsh, mud and sand flats along the shoreline of the Bay are locally important fish and bird habitats. The Department considers mud and sand flats to be important specialized forms of habitat that meets the needs of sensitive fish and wildlife species. The Bay also provides salt pan, coastal strand, and remnant dune habitats important to migratory birds for foraging, nesting, shelter, and rest. These habitats should be avoided and preserved since the majority of the shoreline and shallow bay areas in San Diego County have already been filled or armored.

Beyond the terrestrial and intertidal habitats, the Bay's open surface waters and eelgrass are locally important foraging habitat for many species of fish, birds, marine mammals and the Pacific green sea turtle (*Chelonia mydas*). The Bay's eelgrass habitat is valuable as a breeding and nursery ground for fish and invertebrates such as California halibut (*Paralichthys californicus*), spotted sand bass (*Paralabrax maculatofasciatus*) barred sand bass (*Paralabrax nebulifer*), northern anchovy (*Engraulis mordax*) and California spiny lobster (*Panulirus interruptus*) (City of San Diego, 1990).

- 2) The Mission Bay Park Master Plan goals and objectives should be expanded to develop policies specific to Fiesta Island and Mission Bay to avoid and minimize impacts to sensitive and listed species and their habitats, and to preserve, manage, and expand eelgrass habitat area, intertidal flats, salt pan, and salt marsh habitat areas of the Bay where feasible. For example, Environmental Goal 1.1 (City, 2002) should specify that the park's aquatic biological ecosystems should be managed to improve and protect their biological values, and allow recreation and aesthetic appreciation where those uses do not conflict with the ecosystem management.

Water dependent developments such as boat docks, piers, and launch/access ramps should be located to avoid or minimize habitat loss, wildlife disturbances, and to protect against degradation to existing sensitive Bay habitats. Loss of surface Bay habitat, shading impacts to existing eelgrass habitat, and impacts to least tern foraging areas near the nesting colonies should be avoided to the greatest extent feasible. We recommend the PDEIR consider project alternatives that avoid and/or minimize marine habitat impacts. For example, overwater structures could be located in areas that are least productive for eelgrass such as highly disturbed areas, and/or areas where limited or no eelgrass habitat currently exists. Additionally, an onshore facility above the high tide line may be feasible for non-motorized boating activities.

- 3) The California least tern is listed as endangered under the California Endangered Species Act and Federal Endangered Species Act and is designated as a fully protected species under Fish and Game Code section 3511. Least terns are known to seasonally occur throughout Mission Bay including locations on Fiesta Island. Regional monitoring efforts of least tern for 2016 recorded the lowest number of minimum breeding pairs (3,989) since 2002 while the minimum fledging-to-maximum breeding pair ratio improved slightly from 2015 (Frost, 2016). Similar to year 2015, least tern population growth was negatively affected by direct limiting factors (e.g., lost to predation) and non-predation indirect factors (e.g., abandonment) (Frost, 2016). In addition to avian predators, "[a] lack of sufficient foraging resources is widely thought to be a significant factor limiting California least tern population growth." (Id.) The Department is unaware of least tern foraging studies for Fiesta Island nesting colonies. The Department recommends that the City consider a foraging study to assist the appropriate siting of recreational activities and facilities in a manner that minimize disturbances to least tern foraging activity.

Presently, Fiesta Island includes two areas managed for least terns—one in the southeast corner adjacent the existing dog park (Stony Point), and another within the northernmost finger of the island (north Fiesta Island). Both least tern areas are fenced, and include a buffer area (also fenced) to minimize sport and dog park (among other)

disturbances to least tern colonies. According to the NOP, both Options A and B appear to increase the total area dedicated for dog use. At a minimum, any alternative proposed by the Mission Bay Park Master Plan Update should maintain, if not increase, the current protections and their respective least tern colony buffer areas. Given the region's low reproductive success and pressures on local least tern colonies, the Department recommends that the PDEIR analyze project alternatives that include mitigation measures designed to increase least tern protections, improve foraging quality, and increase local reproductive success. Alternatives should include but not be limited to: 1) increasing the buffers to least tern colonies; 2) limiting access to least tern colonies during low tides by extending the current fence line further into the bay; 3) increasing least tern management activities; 4) disallowing off leash uses adjacent to least tern colonies; 5) precluding recreational uses within key foraging least tern foraging areas (based on the foraging study recommended above); and 6) reducing or eliminating perching opportunities for least tern predators including peregrine falcon (*Falco peregrinus*) and corvids. A range of feasible alternatives should be included to ensure that alternatives to the proposed project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources; particularly specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

- 4) The PDEIR should design the proposed Mission Bay Master Plan Update to complement existing and proposed habitat restoration efforts including: the De Anza Special Study Area (the topic of the City's 2016 De Anza Revitalization Plan); the existing Kendall-Frost Reserve; the northern wildlife preserve—including the potential habitat restoration associated with the Campland on the Bay site, and the San Diego Audubon's ReWild Mission Bay proposal. The PDEIR should analyze the cumulative effects of the various alternatives proposed by the De Anza Revitalization Plan, the lease expiry of the Campland on the Bay site and their respective impacts to Fiesta Island's and Mission Bay's natural resources.

General Comments

To enable the Department to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the PDEIR.

Purpose and Need

- 5) The document should contain a complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.

A range of feasible alternatives should be included to ensure that alternatives to the proposed project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

Biological Resources within the Project's Area of Potential Effect

- b) The document should provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. This should include a complete floral and faunal species compendium of the entire project site, undertaken at the appropriate time of year. The PDEIR should include the following information:
 - a. CEQA Guidelines, section 15125(c), specifies that knowledge on the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
 - b. A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department's California Natural Diversity Data Base in Sacramento should be contacted at www.wildlife.ca.gov/biodgedata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
 - c. An inventory of rare, threatened, endangered and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish and wildlife species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.

Analyses of the Potential Project-Related Impacts on the Biological Resources

- 7) To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the PDEIR:
 - a. A discussion of potential adverse impacts from lighting, noise, human activity, boat traffic, pet intrusion, exotic species, chronic turbidity, sedimentation, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.
 - b. A shading (and coverage of Bay surface waters) analysis should be conducted to determine the impacted areas of Bay habitats. The analysis should include Bay

surface water, water column, benthic habitat, eelgrass habitats, and intertidal flat ecosystems important for fish and shorebird foraging.

- ii) Discussions regarding indirect project impacts on biological resources Impacts on and maintenance of wildlife areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the PDEIR.
- iii) The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.

Mitigation for the Project-related Biological Impacts

- 8) The PDEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
- 9) Department recommends that a habitat gain/loss table be included, which calculates the expected net habitat losses and gains of each type of habitat area lost, restored, enhanced and created.
- 10) The Department recommends that measures be taken to avoid project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations. Sections 3503.5 and 3513 of the California Fish and Game Code prohibit take of all raptors and other migratory nongame birds and section 3503 prohibits take of the nests and eggs of all birds. Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1- September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

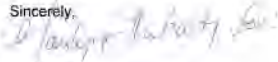
CONCLUSION

We appreciate the opportunity to comment on the referenced NOP. Questions and further coordination on marine issues should be directed to Loni Adams, Environmental Scientist at.

Rebecca Malone, Environmental Planner
City of San Diego, Planning Department
June 8, 2017
Page 7 of 7

Loni.Adams@wildlife.ca.gov or 858-627-3985. Questions and further coordination on other issues should be directed to Eric Weiss, Senior Environmental Scientist, at Eric.Weiss@wildlife.ca.gov or 858-467-4289.

Sincerely,



Gail K. Sevrens
Environmental Program Manager
South Coast Region

cc: William Paznokas (R7-CDFW)
State Clearinghouse, Sacramento

REFERENCES

City of San Diego, 1990. Mission Bay Park Natural Resources Plan.

City of San Diego, Amended 2002. Mission Bay Park Master Plan Update.

Frost, N. 2016. California least tern breeding survey, 2015 season. California Department of Fish and Wildlife, Wildlife Branch, Nongame Wildlife Program Report. 2016-01. Sacramento, CA. 24 pp + Appendices.

Merkel and Associates, Inc., 2016. Mission Bay Biological Resource Letter Report, Mission Bay Navigational Safety Dredging Project, Page 7.



State of California – Natural Resources Agency
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EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



July 10, 2018

Ms. Sara Osborn
City of San Diego, Park Planning
9485 Aero Drive, MS 413
San Diego, CA 92123
PlanningCEQA@sandiego.gov

Subject: Comments on the De Anza Cove Amendment to the Mission Bay Park Master Plan NOP, SCH# 2018061024

Dear Ms. Osborn:

The Department of Fish and Wildlife (Department) has reviewed the City of San Diego's (City) notice of preparation (NOP) of a draft program environmental impact report (PEIR) for the De Anza Cove Amendment to the Mission Bay Park Master Plan (De Anza AMBPMP). The Department previously provided the City with preliminary comments on the De Anza Revitalization Plan (dated December 13, 2016), and commented on the 2017 Mission Bay Park Master Plan Update-Fiesta Island Amendment (dated June 8, 2017, SCH# 2017051034). Our comments made therein are applicable to the current proposed project and are incorporated by reference (see attached). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1800 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City of San Diego participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP). The geographic boundary of Mission Bay Park Master Plan occurs within the Urban Areas of the City's SAP.

In accordance with the NOP, the proposed project seeks to implement the recommendations of the Mission Bay Park Master Plan (MBPMP). The MBPMP recommends that the revitalization of De Anza Cove should serve regional recreation needs, including guest housing (e.g. recreational vehicles and other low-cost camping facilities); contribute to the park's water quality, including creating additional wetlands; facilitate hydrologic improvements to safeguard the viability of marsh areas; provide a waterfront trail, viewing areas, and other passive recreational features; and ensure leaseholds support the Mission Bay recreation use. Mission Bay is a 4,860-acre park within the City. Mission Bay includes a diverse variety of biological resources and habitats including diverse marine habitats, coastal salt marsh, and three terrestrial habitats including salt pan, coastal strand, and disturbed habitat (City, 1990). Mission Bay provides habitats necessary for several CESA and federal Endangered Species Act (ESA) listed species, including the CESA- and ESA-listed endangered Ridgway's rail (*Rallus obsoletus*, also a state fully protected species [FPS]), the CESA-listed endangered Belding's savannah sparrow (*Passerculus sandwichensis beldingi*), and the CESA- and ESA-listed

Conserving California's Wildlife Since 1870

endangered California least tern (*Sterna antillarum browni*; FPS). In addition, Mission Bay hosts diverse numbers of avifauna and supports avian feeding, resting, and breeding. It is also habitat for a number of small mammals and reptile species. Its coastal salt marsh habitats improve the bay's water quality through bioremediation and filtering of pollutants and wastewater discharge.

The Department offers the following comments and recommendations to assist the City in adequately identifying, avoiding, minimizing, and/or mitigating the proposed project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

- 1) The PEIR should specify the CEQA documentation necessary for future project-specific projects to tier from the De Anza AMBMP PEIR. For example, the City should indicate whether it anticipates subsequent project-specific CEQA documents or if a consistency determination process will be followed when tiering from the PEIR. As circulated, the NOP does not provide sufficient detail how future projects tiering from the PEIR will be evaluated for consistency with the MBPMP. CEQA Lead Agencies may elect to prepare a program EIR as a high-level CEQA document addressing "...a series of actions that can be characterized as one large project..." (CEQA Guidelines § 15168). Absent a clear understanding of how the PEIR is intended to be used, the Department is unable to comment on the full breadth of environmental concerns and potential avoidance, minimization, or mitigation measures. Given the nature of a programmatic environmental document, the Department acknowledges that the CEQA Lead Agency is not obligated to fully analyze subsequent activities for which insufficient data exists. However, CEQA findings of significance should only be made when those findings are supported by substantial evidence in the record (CEQA § 15091(b)). For those aspects of the proposed project that have not been fully studied, findings of significance should be set aside when certifying the PEIR until those aspects can be fully studied in a subsequent or supplemental CEQA document (see CEQA Guidelines §§ 15162 and 15163).
- 2) The PEIR should specify which version of the MBPMP the De Anza AMBMP PEIR will use to evaluate the proposed project's consistency with applicable land use planning documents. The NOP states that "[t]he proposed project seeks to implement the recommendations of the MBPMP..." without first having identified if the NOP intends to implement the now-current MBPMP (1997) as amended on July 9, 2002, or the proposed (and unanalyzed/unadopted) amendment (i.e., the De Anza AMBMP) currently being evaluated by this PEIR (SCH# 2018061024). The version of the MBPMP establishes the baseline by which the De Anza AMBMP PEIR's CEQA analysis will be based upon and sets the objectives for achieving the goals of the MBPMP. If, as the project title suggests, the De Anza AMBMP would concurrently amend the MBPMP, the PEIR should identify the full scope of all proposed amendments to the MBPMP and provide a table comparing the differences between the current MBPMP (2002), the MBPMP Fiesta Island Amendment (SCH# 2017051034), and the De Anza AMBMP (SCH# 2018061021).
- 3) The Department recommends that the PEIR analyze opportunities to maximize the footprint of native habitats in conformance with the environmental objectives in the MBPMP. While the NOP identifies the De Anza Cove, the Campland leasehold, and the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP) within the NOP Figure 3, Site Plan, it does not detail the design, elements, timing, or phasing of the implementation of these critical project components. The implementation of the project

components, specifically the KFMR/NWP and the Wetland/Marshland/Natural Recreation, should precede other project components to ensure consistency with the MBPMP, and to safeguard Mission Bay's water quality for the biological resources, natural habitats, leaseholds interests, and improve the recreationalist's experience of Mission Bay. Implementing the habitat components of the proposed project prior to other construction components fulfills a longstanding goal of the MBPMP-Recommendation 26: Relocation of Campland, by protecting Mission Bay's water quality for biological resources and recreationalists alike during construction and operation of the future leaseholds. Additionally, where the information is available, the PEIR should detail the success criteria of the habitat creation/restoration components of the project and indemnify its success through financial sureties. Where the information necessary to establish specific success criteria is not known, the PEIR should identify the Audubon's ReWild Mission Bay as the framework for developing future success criteria.

- 4) Acknowledging that the proposed project intends to amend the MBPMP for De Anza Cove, and that another amendment to the MBPMP for Fiesta Island is being processed (SCH# 2017051034) concurrently, the Department recommends that the PEIR evaluate the full scope of potential actions germane to the MBPMP as part of the cumulative impacts analysis and discussion of related actions. For example, amongst other habitat creation areas (e.g., the Campland lease area), the MBPMP (pp. 43-44) specifically identifies an approximately 110-acre area "...supporting sludge beds on Fiesta Island west of the road, [that] should be considered for a new preserve." Both options A and B of the 2017 MBPMP amendment (SCH# 2017051034) expand dog-use areas (87 acres and 93 acres respectively), whereas the Mission Bay Park Natural Resources Management Plan (MBPNRMP, 1990)—Figure 3 Proposed Wildlife Preserve Additions identifies approximately 80 acres of the same area as "Additional Salt Marsh/Salt Pan Preserve." The Department recommends that the De Anza AMBPMP PEIR include measures to comprehensively address habitat improvement opportunities within the MBPMP planning area by expanding marshland habitats beyond what is currently identified by the NOP, offsetting the 87-93 acres of salt marsh/salt pan preserve that is proposed as a dog park by the 2017 MBPMP amendment. In accordance with the MBPNRMP "[w]ith the Natural Resource Management Plan, a comprehensive approach to habitat protection can clarify development expectations, and facilitate granting project permits which are in conformance with the Management Plan" (City, 1990, p.1). Providing additional salt marsh habitat beyond what is identified by Figure 3-Site Plan of the De Anza MBPMP NOP would provide conservation elements needed as part of a comprehensive plan for Mission Bay Park, meeting the goals/objectives of the current MBPMP and MBPNRMP, and addressing cumulative impacts associated with the proposed project. For example, the biological objectives of the current MBPMP emphasize that "...no net loss of any salt marsh, salt pan, coastal strand associated with a sensitive species, or open water habitat will be permitted without replacement of equal or greater habitat value" and its conclusion that "[e]xpansion of salt marsh upland habitat is important for balancing the negative effect of potential future rises in sea level" (MBPNRMP, pp. 34 and 1, respectively).
- 5) Coastal habitats aid in the improvement of water quality through bioremediation; maximizing habitat restoration at the outfall of Rose Creek (as identified by the MBPMP's Special Study area) would improve Mission Bay's overall water quality—a key objective of the MBPMP. Improved water quality is of such importance to the economic,

recreational, and biological viability of Mission Bay that the very issue leads the document's recommendations citing:

"It is broadly recognized that the Park's [Mission Bay Park] economic and recreational future depends on the quality of the Bay water. In response to fluctuating quality of the Bay waters, this Plan proposes a comprehensive set of measures involving state-of-the-art biological, mechanical, public education and recreation management programs."

We recommend that all De Anza AMBPMP PEIR design alternatives restore contiguous areas of wetlands extending from Rose Creek to De Anza Cove (e.g., expanded marshland habitat). To protect these fragile environments and to maximize their economic, recreational, and biological values we recommend: a) wetland buffers be provided at a minimum of 100-foot wide adjacent to all wetlands within the Coastal Overlay Zone (City Biology Guidelines, 2012), b) the 100-foot minimum buffers do not include trails or other structures, and c) the habitat remains viable in the face of changing climate (e.g., sea level rise). Educational and/or passive recreational use proposals should occur outside of these wetland buffers.

- 6) Increasing the acreage of expanded marshland habitat associated with the De Anza AMBPMP fulfills the MBPMP's objective to expand habitat. It also has the added benefit of combating habitat loss due to sea level rise while also protecting Mission Bay's economic viability (e.g., infrastructure and leaseholds on the De Anza Cove) by alleviating structural/infrastructure flooding associated with sea level rise. By incorporating smart design and planning, the City is in lockstep with the City's Climate Action Plan "[i]nvesting in action now saves lives and provides long term cost savings. As we increase building and occupant resiliency today, we will better able to meet the challenges of a changing climate tomorrow" (City, 2015, p. 64).
- 7) Presently, the De Anza AMBPMP NOP includes only one project design, Figure 3-Site Plan. The NOP should include a range of alternatives that complement existing and proposed habitat restoration efforts including: the De Anza Special Study Area, the existing KFMN/NWP—including the potential habitat restoration associated with the Campland lease site, and the San Diego Audubon's ReWild Mission Bay Feasibility Study. We encourage the City to incorporate project design elements identified by the San Diego Audubon ReWild Mission Bay, as discussed in the Department's letter to the City regarding the 2017 Mission Bay Park Master Plan Update-Fiesta Island Amendment (SCH# 2017051034), the Department's preliminary comments on the De Anza Revitalization Plan, and during our April 17, 2018, meeting with the City, U.S. Fish and Wildlife Service (USFWS), California Coastal Commission (CCC), and San Diego Audubon. The Department believes that the Audubon's "Wildest" Alternative best maximizes habitat creation opportunities within Mission Bay and would restore a modest portion of the approximately 1,700 acres of intertidal habitat once present in Mission Bay. The Department acknowledges the City's need to balance diverse user groups and has therefore met with the City, USFWS, CCC, and the San Diego Audubon Society to discuss alternatives that blend these diverse interests. We look forward to continuing these discussions and finding a balance that meaningfully and successfully increases Mission Bay's natural habitats, improves its water quality, and buffers the effects of sea level rise.

Ms. Sara Osborn
City of San Diego, Park Planning
July 10, 2018
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We appreciate the opportunity to comment on the De Anza AMBPMP NOP. Questions regarding this letter and further coordination on these issues should be directed to Senior Environmental Scientist (Specialist) Eric Weiss at enc.weiss@wildlife.ca.gov or (858) 467-4289.

Sincerely,



Gail K. Sevrens
Environmental Program Manager
South Coast Region

cc: State Clearinghouse, Sacramento
Carolyn Lieberman, U.S. Fish and Wildlife Service, Carlsbad

Attachments:

Attachment A: Department Comments on the De Anza Revitalization Plan, December 13, 2016.
Attachment B: Department comments on the Notice of Preparation of a Draft Program Environmental Impact Report for the Mission Bay Park Master Plan Update-Fiesta Island, June 8, 2017.

References

City of San Diego. May 1990. Final Mission Bay Park Natural Resources Management Plan. Prepared for the Park and Recreation Department by the Development and Environmental Planning, Planning Department, City of San Diego.

City of San Diego. 2002. Mission Bay Park Master Plan Update. City of San Diego. Amended July 9, 2002.

City of San Diego. 2012. San Diego Municipal Code Land Development Code—Biology Guidelines. Amended April 23, 2012.

City of San Diego. 2015. Climate Action Plan.
https://www.sandiego.gov/sites/default/files/final_july_2016_cap.pdf

City of San Diego. 2016. De Anza Revitalization Plan. <http://www.deanzarevitalizationplan.com/>



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February 10, 2022

Jordan Moore
Senior Environmental Planner
City of San Diego
9485 Aero Drive, MS 413
San Diego, CA 92123
JTMoore@sandiego.gov

Subject: De Anza Natural (Project), Notice of Preparation (NOP), SCH #2015081024

Dear Ms. Moore:

The California Department of Fish and Wildlife (CDFW) received a notice of preparation (NOP) of a draft program environmental impact report (PEIR) from the City of San Diego (City) for the Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines. CDFW previously submitted comments in response to the De Anza Revitalization Plan in 2016, and the De Anza Cove Amendment to the Mission Bay Park Master Plan NOP in 2018.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Id., § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on Projects and related activities that have the potential to adversely affect fish and wildlife resources. CDFW also oversees implementation of the Natural Community Conservation Planning (NCCP) program. The City of San Diego participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP).

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's take and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) that is not a covered species under the City's SAP, the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: City of San Diego (City)

Objective: The objective of the Project is to revitalize De Anza Cove in accordance with the Mission Bay Park Master Plan (MBPMP). The MBPMP recommends that the revitalization should serve regional recreation needs, including providing guest housing, contributing to the improvement of the park's water quality, including creating additional wetlands, facilitating hydrological improvements to support marsh areas, providing a waterfront trail, viewing areas, and other recreational features for public use, and ensuring leaseholds support the Mission Bay recreation use. The Project will update the MBPMP to ensure consistency with the Climate Resilient SD Plan and account for sea level rise and climate change.

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The CEQA Guidelines are found in Title 15 of the California Code of Regulations, beginning with section 15002.

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City of San Diego
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Key project components are outlined below:

Kendall-Frost Marsh Reserve/Northern Wildlife Preserve

The Project proposes to expand the existing 88.2 acres of wetland at Kendall-Frost Marsh Reserve/Northern Wildlife Preserve, through creation of an additional 29.0 acres of wetlands at the former Campland site, as well as an additional 103.8 acres of wetlands around De Anza Cove and along the outfall of Rosa Creek.

De Anza Cove Area – North

Existing recreational facilities in the northern and eastern portions of the Project area will remain. The Project proposes an active recreation and aquatics facility in the north section of De Anza Cove, and states that additional opportunities for expanded recreational uses will be analyzed under a General Development Plan in the future.

De Anza Cove Area – South

Land uses proposed in this area include: replacement of the existing RV campground and mobile home park with low-cost visitor accommodations consisting of RV camping sites, cabins or other accommodations, and ancillary facilities; enhancement of existing regional parkland with new recreational amenities; creation of a supervised swimming beach; potential lease of a non-motorized boat rental facility/dock; expansion of existing wetland habitat to include marshes, mudflats, oyster beds, and open water; creation of upland areas to serve as a buffer zone to wetland habitat; parking; and a multi-use path with interpretive signage.



De Anza Natural
De Anza Cove Amendment to the Mission Bay Park Master Plan
Figure 2: Site Plan
(City of San Diego, De Anza Natural NOP 2022)

Location: Mission Bay Park (Bay) is a 4,650-acre park within the City of San Diego. The proposed Project area is located in the northeast corner of Mission Bay and includes the following existing land uses: the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (Preserve), guest housing, athletic fields and tennis courts, a golf course, regional parkland, and the De Anza Cove Area, which is identified as the De Anza Special Study Area in the MBPMP.

Biological Setting: Mission Bay supports a wide variety of biological resources and habitats including diverse marine habitats, coastal salt marsh, and three terrestrial habitats: salt pan, coastal strand, and disturbed habitat (City 1990). Special status species include the CESA- and Federal Endangered Species Act (ESA)-listed endangered light-footed Ridgway's rail (*Recurvirostra occidentalis*), which is also a California Fully Protected Species (FPS); the CESA-listed and endangered Baird's savannah sparrow (*Passerculus sandwichensis bairdii*); and the CESA- and ESA-listed endangered California least tern (*Sterna antillarum brownii*, FPS). Mission Bay also

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historical riparian fauna, small mammals, reptiles, and habitat for avian nesting, roosting, and breeding. The coastal salt marsh habitats improve the Bay's water quality through bioremediation and filtering of pollutants and wastewater discharge.

Marine Biological Setting: Mission Bay is locally known for its bay, estuary, eelgrass, and shallow bay habitats important for fish and wildlife habitat. The Bay is also important fish nursery habitat for fish spawning, shelter, and foraging. The Bay includes large areas (i.e., "beds") of eelgrass (*Zostera marina*, ? *naciformis*), which is a sensitive marine habitat type and is important to many aquatic and nearshore species.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, wildlife, and natural habitats, we recommend the following information be included in the PEIR:

General Comments

- 1) **Biological Resource Inventory:** The document should contain a complete description of the Project, including purpose and need, that describes all terrestrial and marine habitats within or adjacent to the Project area, all staging areas and access routes to the construction and staging areas. The Project area is described as the area in which potential effects may occur.

The document should also provide a complete assessment of the fish and fauna within and adjacent to the Project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. This should include a complete terrestrial and faunal species compilation of the entire Project site, undertaken at the appropriate time of year. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15300). This should include sensitive fish and wildlife species. Seasonal variations in use of the Project area by wildlife should also be addressed. Species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service.

- 2) **Biological Impacts:** To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the PEIR:

- a) a discussion of potential adverse impacts from lighting, noise, human activity, exotic species, recreational uses, and drainage. The latter subject should address: Project-related changes to drainage patterns on, and downstream of, the Project site; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site. Mitigation measures proposed to alleviate such impacts should be included.

- b) discussion regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., existing preserve lands or lands designated as Multi-Habitat Planning Area (MHPA) associated with the City's SAP).

- c) the zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible wildlife conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.

- d) CDFW also recommends that a habitat gain/loss table be included, which calculates the expected net habitat losses and gains of each type of habitat area lost, restored, enhanced, and created.

- 3) **Marine Species and Habitats:** To better understand potential effects and impacts from the proposed Project, baseline surveys should be conducted, and the results included in the PEIR. Baseline surveys of native and artificial marine habitats, and native and non-native species

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should include all marine areas within the Project area (except such as the existing open water bay and estuary habitats of De Anza cove and Rose Creek cutoff), mudflats, eelgrass beds, oyster beds, and sandy beach intertidal habitat. Invasive marine *Caulerpa* spp. should also be included in marine baseline surveys. All excavations and placement of sediment in Project areas within, and adjacent to, all existing natural wetland or eelgrass habitat should be included in a site-specific baseline marine resources survey and Project impacts/benefits assessment. This should be performed to accurately assess wetland restoration benefits and impacts to marine species and habitats. Lists of marine biological species and habitats for the Project area may also be found in the Marine BIOD database on the CDFW's website (<https://wildlife.ca.gov/Conservation/Marine/GIS/MarineBIOD>).

CDFW recommends the marine biological survey and impact assessment reports include a listing of each Project component and the habitat that will be impacted, the total area of habitat impacted and proposed mitigation measures for avoiding, and minimizing impacts. Additionally, the baseline assessment should include a habitat loss/gain summary indicating the total net gain or loss of each habitat impacted versus habitat restored. If impacts or net losses to sensitive, native marine habitats are unavoidable, additional mitigation plans should be developed to compensate for lost existing habitats.

- 4) **Special-status Species:** The PEIR should thoroughly analyze direct, indirect, and cumulative impacts to any special-status species likely to occur in the Project area. Impacts to species designated as F by PEIR must be completely avoided; FFS may not be taken or possessed at any time per § 3611 of the Fish and Game Code. Avoidance measures for avian species may include phasing construction to occur outside of nesting season, conducting species-specific surveys when construction will occur within 500' of a nesting site, retaining a qualified biological monitor on-site during construction, and implementation of no-activity buffers around active nests.

CDFW also considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species not already covered by the City's SAP that results from the Project is prohibited, except as authorized by state law (Fish & G. Code §§ 2060, 2102). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, unless covered by the City's SAP permit, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and G. Code §§ 2080 - 2081, subds. (b), (c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1996, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a "ITP". For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

- 5) **Marine Impacts:** The wetlands restoration Project activities may have direct and indirect impacts to marine species and habitats:
- a. direct loss or conversion of native marine habitats due to fill of open Bay waters;
 - b. burial or excavations/abandoning of native eelgrass habitat and oyster beds;
 - c. turbidity and sedimentation, scouring, and reduced water quality; and,
 - d. significant impacts to sensitive and/or special-status resources including eelgrass beds, and associated eelgrass ecological communities such as benthic and epibenthic invertebrates, fish, and marine birds.

Contaminated or high silt and organic content sediments should not be placed in the marine environment that are not compatible with existing native sediment. High silt content sediments may cause marine soft substrates to be compacted and unsuitable for sustained growth of eelgrass, intertidal and subtidal benthic and epibenthic invertebrates. Compatible sediments are required for healthy marine invertebrate habitat needed for forage of the higher trophic levels such as fish and shorebirds.

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- 6) **Indirect Marine Impacts:** The Draft PEIR should include and address potential adverse indirect Bay water and marine habitat impacts from increased human and boat facilities (overwater structures) such as Bay water shading, lighting, underwater noise, increased non-native, invasive species, and proposed mitigation measures to alleviate such impacts.
- 7) **Sensitive Marine Species and Habitats:** Many important commercial and recreational fish species use the Project area for breeding, shelter, spawning, and foraging. Potential impacts to marine fish, including both commercially and recreationally important species, should be identified and any significant impacts should be avoided and minimized to below a level of significance. A list and description of fish and wildlife species and habitat in the Bay may be found on Marine Bios (<https://wildlife.ca.gov/Conservation/MarineGIS/MarineBios>). Species and habitats which should be addressed include but are not limited to:
 - a. the California spiny lobster (*Paralurus interruptus*) may utilize the open subtidal Bay habitats within or adjacent to the proposed Project. Spiny lobster use eelgrass for shelter which is present throughout the shallow area of the Bay. This species and their habitat are vulnerable to direct and indirect dredging, excavation, fill, burial, turbidity, and sedimentation impacts; and,
 - b. marine plant species which grow in extensive beds within shallow Bay waters are considered sensitive habitat types. In the vicinity of the proposed Project, this may include but is not limited to, eelgrass (*Zostera marina*, L. pacifica).An eelgrass mitigation site is located just south of the Project footprint. The mitigation site was created to mitigate for eelgrass impacts related to the Mission Bay Navigational Channel Dredging Project completed three years ago. This eelgrass mitigation site should be identified and addressed in the PEIR. Avoidance and minimization measures should be proposed for the eelgrass mitigation site.
- 8) **Invasive Species:** Disturbance of the bottom sediments from dredging construction may redistribute non-native species that compete with native species. This could cause widespread adverse impacts to the marine ecosystem. The invasive algae *Caulerpa taxifolia* is listed as a federal noxious weed under the U.S. Plant Protection Act and while deemed eradicated in 2006 is monitored for potential future emergence. Another invasive algae species found recently in Southern California (Newport Bay) is *Caulerpa prolifera*, which is also a potential threat to the native marine ecosystem.

CDFW recommends including a mitigation measure detailing a pre-construction *Caulerpa* spp. survey to identify potential existence of invasive *Caulerpa* spp. as described in the *Caulerpa Control Protocol* (<https://www.fisheries.noaa.gov/west-coast/habitat-conservation/aquatic-invasive-species-west-coast>). If *Caulerpa* spp. are found, do not disturb the species and contact CDFW and National Marine Fisheries Service within 24 hours as described in the *Caulerpa Control Protocol*.
- 9) **Mitigation for Project-related Biological Impacts:** The PEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or mitigation should be discussed in detail. If on-site mitigation is not feasible, or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be discussed.
- 10) **Cumulative Effects Analysis:** A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15120, General and specific issues, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats. The PEIR should evaluate the full scope of potential actions germane to the MBPMP as part of the cumulative impact analysis and discussion of related actions.
- 11) **Range of Project Alternatives:** The PEIR should include a range of Project alternatives that complement existing and proposed habitat restoration efforts including: the De Anza Special Study Area, the existing KFR/NWP – including the potential habitat restoration associated with the Campland lease site, and the San Diego Audubon's RedWing Mission Bay Feasibility Study. We continue to encourage the City to maximize incorporation of Project design elements identified by the San Diego Audubon's RedWing Mission Bay, as discussed in CDFW's 2017 and 2018 comment letters (CDFW 2017), (CDFW 2018). The PEIR should fully consider and evaluate a range of alternatives that avoid or otherwise minimize impacts to marine and terrestrial biological resources.

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12) **Project Phasing:** As indicated in our 2019 comment letter in response to the De Anza Cove Amendment to the Mission Bay Park Master Plan NOP (CDRW/2018), CDRW recommends that the PEIR analyze opportunities to maximize the footprint of native habitats in conformance with the environmental objectives in the MBPMP. Critical Project components such as specific design elements, timing, and phasing of implementation are not detailed within the NOP. Implementation of Project components, specifically the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve, wetland expansion, and upland and duffer creation should precede other Project components to remain consistent with the MBPMP and to safeguard Mission Bay's water quality for the biological resources, natural habitats, leasehold interests, and recreational uses. Implementing the habitat components of the proposed Project prior to other construction components fulfills a longstanding goal of the MBPMP-Recommendation 28. Reclamation of Camp and, by protecting Mission Bay's water quality for biological resources and recreationalists all during reconstruction and operation of the future leaseholds. Additionally, where the information is available, the PEIR should detail the success criteria of the habitat creation/reclamation components of the Project and identify its success through financial surpluses. Where the information necessary to establish specific success criteria is not known the PEIR should identify the Audubon's ReWild Mission Bay as the framework for developing future success criteria.

Specific Comments

13) **Wetland Expansion:** Although the De Anza Natural Project significantly improves focus on wetland expansion by comparison to the 2018 De Anza Cove Amendment to the Master Plan, we continue to encourage the City to analyze the possibility of incorporating native habitat along the entire De Anza peninsula. The marsh habitat associated with the Northern Wildlife Preserve (including the Kendall-Frost Reserve) serves an important regional nesting, feeding, and migratory stop within the Pacific Flyway, and also acts as a significant bioremediation tool to improve water quality—a key focus of the MBPMP and the Mission Bay Natural Resources Management Plan (City of San Diego, 2002 and 1990 respectively). The City's planning documents have long recognized the mutual benefits that improved water quality offer public recreation and habitat values specifically stating that the De Anza Special Study Area (SSA) "...shall not be developed to the detriment of existing and/or future adjacent habitat areas. Foremost in consideration should be the extent to which the SSA can contribute to the Park's [Mission Bay Park] water quality. In fact, additional wetlands creation *must be considered* [emphasis added] as part of the SSA." (City, 2002, p. 55).

14) **Belgrass and Wetland Type Conversion:** CDRW does not recommend any development or conversion that would result in a reduction of wetland and/or eelgrass acreage or habitat values. If conversion of these habitats is unavoidable, the City should provide appropriate mitigation measures and compensation for lost habitat. Project mitigation should ensure there will be "no net loss" of either wetland or eelgrass habitat values or acreage. Development and conversion includes, but is not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, eelgrass and channelization or removal of substrate materials from the wetland or eelgrass bed. All eelgrass habitat and potential eelgrass habitat, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks that preserve the aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to these aquatic resources should be included in the PEIR.

15) **Climate Change Resiliency:** The PEIR should address climate resiliency with both planning and design aspects of the Project. General climate change models illustrate that areas of De Anza will be subject to sea level rise, which may jeopardize the redevelopment of De Anza, absent major structural infrastructure. The PEIR should clearly analyze how sea level rise will affect the site, particularly the created wetlands. Project Alternatives should consider the effects of potential sea level rise and climate change on major habitat modifications. Analysis should include discussion of infrastructure and long-term maintenance, as well as congruency with the Climate Resilient SD Plan.

16) Recreational Use:

a) **Camping:** The NOP indicates that:

the existing RV campground and vacant De Anza Mobile Home Park would be replaced with low-cost guest housing allowing for approximately 800 camping sites for RVs, cabins or other eco-friendly accommodations and associated open space and facilities consistent with camping accommodations. Camping-oriented snailery facilities and amenities, such as food services/compartments, would also be provided on site.

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CDPW does not consider RV camping to be a passive recreation use; the PEIR should analyze the proposed overnight guest housing on the De Anza peninsula as an active recreational use and discuss how surrounding natural habitat will be impacted. To maximize habitat values and improve water quality, we recommend that commercial and other land use developments be strategically located farthest away from sensitive resources to include wetlands and open waters of the bay.

- h) **Watercraft:** The NOP states that a small non-motorized boat lease area is proposed as part of the Project and an existing boat ramp in De Anza Cove would be removed. Motorized watercraft access currently exists just east of the Project boundary of the De Anza Boat Launch. The NOP goes on to state that non-motorized persons (watercraft) would have access to De Anza Cove from the new potential boat lease, while motorized boats could access De Anza Cove from the existing boat ramp part of the Project area. CDFW recommends that De Anza Cove be limited to non-motorized watercraft and swimming uses only. Allowing motorized watercraft activities in De Anza Cove risks damage to the proposed eastern wetlands, resulting from boats operating close to, or directly in, wetland areas. Noise from motors may also disturb nesting or foraging avian species. Indirect impacts to the wetlands could occur from pollution and increased turbidity caused by motorized watercraft.

- 17) **CEQA Document Tiering:** The NOP indicates that specific active recreation uses at the north section of De Anza Cove will be determined during future site planning efforts as part of a General Development Plan through a public process. While we appreciate additional public involvement in the future, the PEIR should specify what mechanisms under CEQA will be employed. As expressed in our 2018 comment letter (CDFW 2018), the City should indicate whether it anticipates subsequent Project-specific CEQA documents, or if a consistency determination process will be followed when being from the PEIR.

CEQA Lead Agencies may elect to prepare a Program EIR as a high-level CEQA document addressing a series of actions that can be characterized as one large Project (see CEQA Guide lines § 15108). Assent's clear understanding of how the PEIR is intended to be used, CDFW is unable to comment on the full breadth of environmental concerns and potential avoidance, minimization, or mitigation measures. Given the nature of a programmatic environmental document, CDFW acknowledges that the CEQA Lead Agency is not obligated to fully analyze subsequent activities for which insufficient data exists. However, CEQA findings of significance should only be made when those findings are supported by substantial evidence in the record (CEQA § 15091(b)). For those aspects of the proposed Project that have not been fully studied, findings of significance should be set aside when certifying the PEIR until those aspects can be fully studied in a subsequent or supplemental CEQA document (see CEQA Guide lines §§ 15162 and 15163).

- 18) **Jurisdictional Delineation and 1600 Notification:**

c) The Project area supports aquatic, riparian, and wetland habitats, therefore, a jurisdictional determination of the wetlands, Rose Creek, and associated riparian habitats should be included in the PEIR. Please note that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

d) The CDFW has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1000 of seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the application is required prior to conducting the proposed activities. CDFW's issuance of a LSAA for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. CDFW as a Responsible Agency under CEQA may consider the City's PEIR for the Project. To minimize additional requirements by CDFW pursuant to section 1600 of seq. and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSAA.

- 19) **Marine Mitigation Measures:**

At a minimum, the following marine mitigation measures should be incorporated into a Marine Impact Avoidance, Minimization and Monitoring plan for any proposed sediment placement and fill work within or adjacent to the marine habitats of Mission Bay.

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- e) Avoidance Measures: Equipment, vehicle routes, dump trucks, bulldozers, and workers should travel, set up, and operate outside the Bay habitat boundaries to the extent feasible to avoid significant Project impacts to marine habitat, species, and water quality. All driving, dumping, bulldozing routes and locations should be referenced on maps and diagrams in relation to the marine habitat boundaries showing potential areas of impact.
- b) Avoidance Measures: The CDFW recommends avoidance of eelgrass and marine habitat impacts. Project alternatives and designs should include construction methods designed to fully avoid impacts to existing sensitive marine fish and wildlife and associated marine habitats.
- c) Minimization Measure: For Bay sandy beach and mudflat protection or creation, dredge or excavated sediments to be used as fill should be sampled under an approved sediment analysis plan, and only clean, beach or mudflat compatible sand should be placed on receiver beaches. Dredged sediments should be similar to receiver beach sediments in grain size, color, and percent silt content.
- d) Minimization Measure: Hydrological modeling should be done to identify appropriate sediment placement volumes and locations to minimize significant marine habitat and creek mouth impacts.
- e) Minimization Measure: Silt curtains and coffer dams should be used to the extent feasible to minimize turbidity and sedimentation impacts for all sensitive marine habitats and species.

Eelgrass and Shallow Water Habitat Mitigation Measures: Eelgrass is a sensitive habitat that is highly productive as a juvenile fish nursery, and used by adult fish and invertebrates for foraging, spawning, and shelter. Eelgrass beds are also considered a "special aquatic site" and given protections by the Clean Water Act. Additionally, the importance of eelgrass protection and restoration, as well as the ecological benefits of eelgrass, is identified in the California Public Resources Code (PRC) 35630. Guidance for eelgrass habitat impact avoidance, minimization, and compensatory mitigation as well as guidance for eelgrass mitigation banking is provided by the California Eelgrass Mitigation Policy (CEMP), (NOAA, 2014). (https://media.fisheries.noaa.gov/dsm-illustration/cemp_oct_2014_final.pdf)

If transplanting of eelgrass is required for eelgrass compensatory mitigation, a Scientific Collecting Permit (SCP) from CDFW will be required prior to harvest and transplanting activities. The SCP may include conditions such as donor bed surveys, limits on number and density of turfs collected, methods for collection and transplanting, notification of activities, and reporting requirements. Please visit the CDFW's SCP webpage for more information: <https://wildlife.ca.gov/it/collecting/ScientificCollecting>.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003 subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDB/SubmittingData>. The types of information reported to CNDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs. tit. 14, § 753.5; Fish & Game Code, § 711.4; Pub. Resources Code, § 21089.)

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CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the City in identifying and mitigating Project Impacts on biological resources. Questions and further coordination on terrestrial issues should be directed to Jessie Lane, Environmental Scientist at Jessie.Lane@wildlife.ca.gov. Questions and further coordination on marine issues should be directed to Lori Adams, Marine Environmental Scientist at Lori.Adams@wildlife.ca.gov.

Sincerely,



David Mayer
Environmental Program Manager
South Coast Region

cc: Jennifer Turner, CDFW – Jennifer.Turner@wildlife.ca.gov
Eric Wilkins, CDFW – Eric.Wilkins@wildlife.ca.gov
State Clearinghouse, Office of Planning and Research – State_Clearinghouse@opr.ca.gov
City of San Diego, CEQA Planning – PlanningCEQA@cityofsan.org
Carolyn Lieberman, USFWS, Carlsbad – Carolyn.Lieberman@fws.gov

Attachments

Attachment A: CDFW Comments on the De Anza Revitalization Plan, December 13, 2016

Attachment B: CDFW Comments on the Notice of Preparation of a Draft Program Environmental Impact Report for the Mission Bay Park Master Plan Update-Fiesta Island, June 9, 2017

Attachment C: Comments on the De Anza Cove Amendment to the Mission Bay Park Master Plan NOP, July 10, 2018.

References

California Department of Fish and Wildlife (CDFW), December 13, 2016, Comments on the De Anza Revitalization Plan.

California Department of Fish and Wildlife (CDFW), June 9, 2017, Comments on the Notice of Preparation of a Draft Program Environmental Impact Report for the Mission Bay Park Master Plan Update-Fiesta Island.

California Department of Fish and Wildlife (CDFW), July 10, 2018, Comments on the De Anza Cove Amendment to the Mission Bay Park Master Plan NOP.

City of San Diego, May 1990, Final Mission Bay Park Natural Resource Management Plan. Prepared for the Park and Recreation Department by the Development and Environmental Planning, Planning Department, City of San Diego.

City of San Diego, 2002, Mission Bay Park Master plan update. City of San Diego, Amended July 9, 2002.

City of San Diego, 2012, San Diego Municipal Code Land Development Code—Biology Guidelines, Amended April 23, 2012.

City of San Diego, 2015, Climate Action Plan
https://www.sandiego.gov/sites/default/files/final_july_2015_cap.pdf

City of San Diego, 2018, De Anza Revitalization Plan. <http://www.deanazarevitalizationplan.com/>

NOAA (National Oceanic and Atmospheric Administration) Fisheries, West Coast Region
2014 California Eelgrass Mitigation Policy and Implementing Guidelines.

Comment Letter S3: University of California San Diego Natural Reserve System, April 20, 2023

S3

From: [Henter, Heather](#)
To: [P41_MarreroC406](#)
Cc: [Kee, Kathleen](#); [Norms, Richard](#); [Talley, Theresa](#); [Matheson, T. Scott](#)
Subject: [EXTERNAL] Comments on De Anza Natural Amendment
Date: Thursday, April 20, 2023 4:50:23 PM
Attachments: [NRS comments on DeAnza Nat DER 2023.04.20.pdf](#)

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Heather Henter, Ph.D.
Executive Director
Natural Reserve System, UC San Diego
(<http://nrs.ucsd.edu>)

hhenter@ucsd.edu

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[March 2023 newsletter](#)

April 20, 2023

Attn: Heidi Vonblum
Planning Director
City of San Diego Planning Department
9485 Aero Dr, M.S. 413
San Diego, CA 92123

PlanningCEQA@sandiego.gov

Dear Director VonBlum,

Please accept our comments on the Draft Program EIR for the DeAnza Natural and Alternate Site Plans, SCH #2018061024

Improvements in the current DeAnza Natural Plan

The current site plan (Figure 3) is improved relative to the previous version (January 2022 NOP), most notably the removal of most of the peninsula extending south from Pacific Beach Drive and better hydrologic connection with Rose Creek. The potential location of an environmental research and education center in conjunction with the regional parkland east of Rose Creek is a good idea, whereas the site west of Rose Creek would prevent easy access for the public arriving by personal vehicle, student group transport (bus) or the trolley.

However, we do have concerns, described below.

Project objectives

The Project Objectives are too vague and do not allow for an unbiased evaluation of the Plan and the Alternatives. We give one example here. The DEIR states that the Wetlands Optimized Alternative does not meet...

- a. Objective 1 (*Provide equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access.*)
- b. Objective 5 (*Diversify active and passive recreational uses that will serve a range of interests, ages, activity levels, incomes, and cultures both on land and in water.*)
- c. Objective 6 (*Enhance public access and connectivity within De Anza Cove and increase connections to the surrounding communities, including opportunities for multimodal travel.*)

...because the wetlands restoration would reduce the area for low-cost visitor guest accommodations and open beach uses (p. 8-43). The De Anza Natural Plan apparently does meet these objectives with larger acreage for "RVs, cabins, or other eco-friendly accommodations and associated open space and facilities consistent with camping accommodations" (likely managed by a private lease-holder). Objectives 1, 5, and 6 are very

NRS comments on DeAnzaNat DEIR 2023.04.20.docx

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S3-1: This comment states that the current site plan (PEIR Figure 3) is improved relative to the previous version (January 2022 Notice of Preparation (NOP)), most notably the removal of most of the peninsula extending south from Pacific Beach Drive and better hydrologic connection with Rose Creek. The City of San Diego (City) appreciates the University of California Natural Reserve System's review of the Program Environmental Impact Report (PEIR) for De Anza Natural Amendment to the Mission Bay Park Master Plan (project). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft PEIR. Therefore, no further response is warranted.

S3-2: This comment states that the project objectives are too vague and do not allow for an unbiased evaluation of the plan and the project alternatives. The project's objectives, which are defined in PEIR Chapter 3.0: Project Description, explain the underlying purpose of the project and are used to develop a reasonable range of alternatives in line with the requirements of CEQA Guidelines Section 15124. No revisions to the Draft PEIR are warranted.

S3-2 cont. general in their call for public access and use, but the evaluation of the objectives is very specific - weighing acreage of low-cost visitor guest accommodations and open beach uses more heavily. There are many ways to provide access to, and use of, the coast, however -- walking trails, bike paths, non-motorized boat launches and boating areas, nature viewing areas, educational displays or an educational center that encourage access, to name just a few (all underrepresented uses in Mission Bay). In fact, the State Coastal Conservancy's Explore the Coast program suggests that recreational vehicles (RVs) are not the best way to diversify our coastal accommodations (Explore the Coast Overnight, an Assessment of Lower Cost Guest Accommodations, 2019). Please provide evidence as to why these very specific uses (RVs, cabins, or other eco-friendly accommodations), to the exclusion of other uses, are required to meet Objectives 1, 5, and 6. Please specifically address why the Plan gives special consideration to RVs given the assessment in the report cited above.

The objectives of the DeAnza Natural Plan also deviate from the guiding principles of the Mission Bay Master Plan (MBPMP) by not adequately addressing the following.

S3-3 a. Water Quality: The DEIR does not adequately address the environmental goals of the Mission Bay Park Master Plan (MBPMP), which states that water quality improvement is the 'foremost' consideration for land uses in the De Anza Special Study Area. Water quality should be included in the Project Objectives. Please include "Improve the water quality of the study area and the bay through natural, resilient wetland infrastructure." as an Objective (p. S-2)

S3-4 Because DeAnza Natural Plan fails to provide evidence that it will improve water quality, and will do so more effectively than the alternatives, the first row of Table S-4 of the PEIR is not accurate.

S3-5 The DEIR does not provide an adequate explanation -- no hydrological models or processes cited -- to support the assumption that the continued flows of untreated water constrained to channels as described in the DeAnza Natural Plan will improve water quality compared to detaining the water in wetlands to allow for settlement of particulates and biogeochemical transformations of pollutants as would occur in the Wetlands Optimized Alternative. Please provide these details.

S3-6 The preferred design includes a semi enclosed swimming beach in the NE corner of the bay, which has been shown to be the most polluted part. The DEIR claims that the flushing of the proposed bay by connecting it to Rose Creek will mitigate the problem. However, the City has not done a modeled hydrologic or water quality assessment to determine if this connection to Rose Creek would actually improve water circulation.

Given that swimming is available in other areas of Mission Bay that consistently have safer water quality, provide an explanation for including this feature as preferred, rather than contiguous wetland in the area.

S3-7 Please explain how De Anza Natural and all alternatives will impact water quality in the study area and Mission Bay in general.

S3-3: This comment states that Draft PEIR does not adequately address the environmental goals of the Mission Bay Park Master Plan (MBPMP), which states that water quality improvement is the foremost consideration for land uses in the De Anza Special Study Area. Appendix B of the PEIR provides an analysis of the project's consistency with the goals and objectives of the Mission Bay Park Master Plan (MBPMP). Specifically, the project would promote MBPMP policies that support the expansion of open space by removing Campland on the Bay (Campland) and replacing it with a natural habitat area contiguous with the existing Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP). The project would sustain and enhance the biodiversity of the KFMR/NWP and expand natural habitat areas contiguous to this existing preserve, which would improve water quality.

The project objectives listed in PEIR Chapter 3.0, Project Description, include Objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Chapter 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions are warranted.

S3-4: This comment states that the Draft PEIR does not provide evidence that the project will improve water quality and will do so more effectively than the alternatives. PEIR Chapter 8.0, Alternatives, includes a general description of each project alternative, along with a discussion of its ability to

reduce the significant environmental impacts associated with the proposed project. In accordance with the California Environmental Quality Act (CEQA) Guidelines, Section 15126.6(b), the alternatives discussion should focus on those alternatives that, if implemented, could eliminate or reduce any of the significant environmental impacts of a project. The alternatives are evaluated to determine if they would eliminate any significant adverse environmental impacts or reduce those impacts to a below a significant level. An analysis of potential impacts related to water quality were addressed for each alternative in PEIR Chapter 8.0 Alternatives, in accordance with CEQA. In addition, the project's effect on water quality was analyzed in PEIR Section 5.7, Hydrology and Water Quality, and no significant impacts were identified. PEIR Table S-4, Summary of Significant Environmental Impacts, summarizes the conclusions of the environmental analysis in this PEIR and is consistent with the analysis in PEIR Section 5.7. Therefore, no revisions to the Draft PEIR are warranted.

S3-5: This comment states that the DEIR does not provide an adequate explanation to support the assumption that the continued flows of untreated water constrained to channels as described in the De Anza Natural Plan will improve water quality compared to detaining the water in wetlands to allow for settlement of particulates and biogeochemical transformations of pollutants as would occur in the Wetlands Optimized Alternative. In accordance with CEQA, the PEIR focuses on the potential water quality impacts of the proposed project as opposed to the improvement that would result from implementation of the proposed project. PEIR Section 5.7, Hydrology and Water Quality, discloses that the project would have the potential to result in long-term

operational pollutants associated with components of the project, such as guest accommodations, parking areas, and street improvements that would introduce potential pollutants, including sediments, heavy metals, nutrients, trash and debris, oxygen-demanding substances, oil and grease, pesticides, and bacteria and viruses. Due to the project's location within and adjacent to Rose Creek and Mission Bay, the immediate pollutants of concern are those that contribute to the eutrophic conditions at the mouth of the Rose Creek inlet (nutrients) and the high coliform counts along the Mission Bay shoreline. In addition, the expansion and regrading required for wetland restoration could lead to increased erosion.

PEIR Table 5.7-1, Recommended Best Management Practices, provides a preliminary list of recommended BMPs and would be refined and implemented as part of final project design and monitoring programs for future project activities consistent with the project in accordance with the City's Stormwater Standards Manual that requires the preparation of a Stormwater Quality Management Plan (SWQMP). In addition, proposed water quality detention basins would be of differing sizes and would capture and treat stormwater before flowing into Mission Bay. Water quality detention basins would be designed with a sediment forebay, a height-appropriate embankment specific for each area of treatment, and a base to reduce sediment and erosion at the outflow. Native plants would be used to reduce sediment and total suspended solids from stormwater. Additional water quality-enhancing features would include vegetated areas bordering all development to reduce stormwater contamination, including debris and sediment, from reaching Mission Bay. Revegetating the

edges of Rose Creek and along the “boot” of De Anza Cove with marsh, wetland, and upland native plants would create another water quality-enhancing feature.

As described in PEIR Section 1.4.1, Type of PEIR, General Development Plans (GDPs) will be developed over time and will provide precise engineering and construction plans for the various elements of the project. Since these plans are currently not available at the planning level, their environmental impacts have been estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements. Once the project design has been finalized and prior to approval, the City will route the project through the Public Project Assessment process, including the preparation of the appropriate environmental documentation in accordance with California Environmental Quality Act (CEQA). At that time, specific mitigation measures will be developed based on the site -specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. The City also acknowledges that, due to lack of detail and site design in the PEIR, many future projects will undergo site-specific CEQA review, which is the appropriate time to evaluate site-specific impacts. No revisions to the PEIR are warranted.

S3-6: This comment states that the City has not done a modeled hydrologic or water quality assessment to determine if the connection to Rose Creek would improve water circulation. Further, this comment requests an explanation for including a semi-enclosed swimming beach in the northeast corner, rather than contiguous wetland in the area. Please refer to responses to comments S3-4 and S3-5. As discussed in PEIR Chapter 3.0, Project Description, no development is

currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. See response to comment S3-9. The MBPMP calls for a “balanced approach” (City of San Diego 2021a) with three components: recreation, commerce, and environment. The project would enhance the existing regional parkland by providing a variety of uses, including active and passive recreational opportunities to enhance public use of the area, and improvements to access to recreational uses. A sandy beach area at the northern and western edges of De Anza Cove would be adjacent to and compatible with the low-cost visitor guest accommodation use. The addition of a beach area is in line with the goals of the MBPMP. No revisions to the PEIR are warranted.

S3-7: This comment requests an explanation of how De Anza Natural and all alternatives will impact water quality in the study area and Mission Bay in general. Please refer to responses to comments S3-4 and S3-5.

S3-8 b. **Habitat Restoration:** The Natural Resources Management Plan (NRMP) for Mission Bay (2002, essentially unchanged since the 1990 version) remains the guiding document for natural habitat protection and restoration in Mission Bay. That plan lays out a vision for preserving the co-existence of resilient natural habitats and human uses for 188 years.

It specifically identifies the fill area currently occupied by Campland as the unique area of Mission Bay where substantive saltmarsh habitat can be restored in a large, contiguous area that is the most beneficial for wildlife:

"A larger habitat base allows an expansion of population necessary to counterbalance the negative impact of a progressively urban influence and future threat of rising sea levels. Expansion of salt marsh and upland habitat is important for balancing the negative effect of potential future rises in sea level.

In spite of the urgent need to restore a hydrological connection between Rose Creek and the Kendall-Frost Marsh/Northern Wildlife Preserve, none of the alternatives described in the DEIR give any specific goals for the wetland restoration west of Rose Creek. The following need to be added to the Preferred, Wetlands Optimized and Wetlands/Park Optimized Plans:

S3-9 a. Specific population goals for the endangered species within the MHPA, including Belding's Savannah Sparrow and the Light-footed Ridgway's Rail

b. Specific goals in terms of acres of critical habitat for these species, with details of sediment characteristics, plant community composition, and

c. Specific adjacency rules to protect the existing and future populations of these species, including no, or only shielded, lighting of recreation fields and other nearby land uses; no vegetation or structures to enhance avian predator success in the wetlands; sounds limited to scientifically-confirmed safe limits; no polluted runoff or air pollution; and no intrusions by flying objects or machines

d. Plans for coordinating with the UCSD Natural Reserve System to study and monitor these populations (per the RNMP)

S3-10 Furthermore, the emergent wetland is not homogeneous: cordgrass habitat required by the light-footed Ridgway's rails occupies areas that are inundated for longer periods (i.e. are at lower elevations) than areas dominated by perennial pickleweeds (higher in the marsh), which are lower than areas needed by the wandering skipper (the co-occurrence of high marsh saltgrass and *Frankenia*). And throughout the wetland there is an intricate network of deeper branched channels essential for water circulation and the functioning of the ecosystem. Without a clear distinction between these areas, it is impossible to assess the existing and proposed habitat areas described in the alternative plans, the impacts to those areas, and the benefits of the alternatives for all purposes, including water quality improvements, sea level rise resiliency, endangered species support, etc.

Please map out the habitat types listed in Table 2-3 and describe the required underlying sediment characteristics, pore-water salinity and inundation times for those planned to be included in the habitat restoration areas. Without these fundamental properties in place there is no way to obtain the vegetation planned for; and without the requisite vegetation there will be no wildlife.

S3-8: This comment states that the Natural Resources Management Plan (NRMP) for Mission Bay identifies the fill area currently occupied by Campland as the unique area of Mission Bay where substantive saltmarsh habitat can be restored in a large, contiguous area that is the most beneficial for wildlife. As discussed in PEIR Chapter 3.0, Project Description, the project includes enhancement and restoration within the existing KFMR/NWP and the expansion of wetlands currently occupied by Campland as shown on PEIR Figure 3-1, Site Plan. The project would follow the MBPMP recommendation of replacing the existing Campland area with expanded marshland/habitat area, which would include a combination of mudflats, wetlands, and upland habitats.

S3-9: This comment states that the DEIR doesn't give any specific goals for wetland restoration west of Rose Creek, and should include specific population goals for the endangered species within the MHPA, acres of critical habitat, and specific adjacency rules to protect existing and future populations of these species. As discussed in PEIR Chapter 3.0, Project Description, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. The CEQA Guidelines contain guidance on when a PEIR may be prepared. As explained in the Draft PEIR, CEQA Guidelines Section 15168 states that "A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) Geographically, (2) A logical parts in the chain of contemplated actions, (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or (4) As

individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.”

CEQA Guidelines, Section 15146, defines the degree of specificity necessary in an EIR: “The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.” Therefore, an EIR for a project such as the adoption of a Master Plan Amendment should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow. Therefore, the Draft PEIR does not serve as project-level environmental analysis for any specific development project and adequate information is not available at this time to address potential future site-specific impacts of the proposed project. The mitigation framework provided in the PEIR is adequate for program-level environmental review of the project and does not defer mitigation.

As discussed in PEIR Chapter 3.0, Project Description, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. The Draft PEIR acknowledges that the City will evaluate future detailed GDPs for future projects as they are developed. A GDP, as defined in City Council Policy 600-33, is a Conceptual Master Plan that identifies the activities and amenities to be included in a park. As described in PEIR Section 1.4.1, GDPs will be developed over time and will provide precise engineering and construction plans for the

various elements of the project. Since these plans are currently not available at the planning level, their environmental impacts have been estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements. City Council Policy 600-33 also outlines the public participation process for the development of future GDPs. A public workshop is required to provide details of the project, including proposed scope, schedule, cost, and related information and would discuss the necessary steps for project review and approval. Once the project design has been finalized and prior to approval, the City will route the project through the Public Project Assessment process, including the preparation of the appropriate environmental documentation in accordance with CEQA. At that time, specific mitigation measures will be developed based on the site specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. The City also acknowledges that, due to lack of detail and site design in the PEIR, many future projects will undergo site-specific CEQA review, which is the appropriate time to evaluate site-specific impacts.

PEIR Section 5.3, Biological Resources, concludes that the project has the potential to directly impact sensitive wildlife species with a potential to occur on site, including the Belding's Savannah Sparrow and the Light-footed Ridgway's Rail, during construction activities and operation of the project through displacement of individual wildlife or elimination of portions of their habitat. Conformance with the Multiple Species Conservation Program (MSCP) Subarea Plan (SAP) provides incidental take coverage for covered species such that impacts to those species outside the City's Multiple Habitat Planning Area would not be considered

significant (due to conservation of the species provided by MSCP SAP implementation). Further, implementation of Area-Specific Management Directives (ASMD) for applicable MSCP SAP covered sensitive wildlife species that occur in the project area would be required as a condition of project approval. As future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project, and any impacts to these sensitive wildlife species would be avoided, minimized, or mitigated as conditions of project approval prior to the implementation of the future site-specific projects.

PEIR Section 5.3 also analyzes potential indirect impacts from operational activities to sensitive plant species, wildlife species, and vegetation communities. Permanent edge effects may include intrusion by humans and domestic pets, resulting in possible trampling of individual plants, invasion by exotic plant and wildlife species, exposure to urban pollutants (fertilizers, pesticides, herbicides, and other hazardous materials), soil erosion, litter, fire, and hydrologic changes (e.g., surface and groundwater level and quality). As part of the GDP process, as future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project, and any impacts would be avoided, minimized, or mitigated as conditions of subsequent project approval prior to the implementation of the future site-specific projects.

In addition, this comment states that the PEIR should include plans for coordination with the University of California Reserve System. The City looks forward to working with University of California Reserve System and additional stakeholders through the public engagement opportunities

of the GDP process as future project detailed design is available. No revisions to the Draft PEIR are warranted.

S3-10: This comment states that emergent wetland is not homogenous and without specific distinction of habitat the existing and proposed habitat areas described in the alternative plans, the impacts to those areas, and the benefits of the alternatives for all purposes cannot be clearly assessed. Please refer to response to comment S3-9. As discussed in PEIR Chapter 3.0, no development is currently proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. This comment will be considered when evaluating future project detailed design.

The comment also requests to map out the habitat types listed in PEIR Table 2-3 and describe additional details for the habitat restoration areas. PEIR Figure 5.3-1, Impacts to Biological Resources – Proposed Project, identifies the habitats described in PEIR Table 2-3. Please refer to response to comment S3-9. As described in PEIR Section 1.4.1, GDPs will be developed over time and will provide precise engineering and construction plans for the various elements of the project. As future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project. Specific details of the habitat types in the proposed wetland and marshland creation areas, such as acreage for each habitat type and details to ensure the successful establishment of habitat including sediment characteristics, pore-water salinity and inundation times, would be determined at that time. The City also

S3-10
cont.

Without these details in the Plans, the city is not fulfilling its legal responsibility to protect MSCP covered species. Furthermore, the DeAnza Natural Plan and its alternatives cannot be analyzed with regard to whether they can actually provide habitat expansion. These goals should be established in the final PEIR.

S3-11

3. Wetland design. Contrary to this long-accepted principle of the need for an extensive contiguous area of wetland habitat for it to be resilient, the DeAnza Natural Plan fragments the restored wetland east of Rose Creek, confining it in places to strips of wetland along Rose Creek around islands. There are no published literature or other models or studies cited in the DeAnza Natural Plan to support the concept that this fragmented design will function in either the medium- or long-term as natural wetlands, or provide the desired wildlife habitat, water quality improvements, or protection again rising sea levels. This design flaw has five consequences:
- a. The marsh will grow poorly or not at all around the islands proposed in the DEIR, likely creating a series of mudflats rather than wetland. Hence, the proposed acreage of restored wetlands is likely overstated in the DeAnza Natural Plan
 - b. Carbon sequestration within the wetland will be less than shown as expected in the DeAnza Natural Plan
 - c. Recreational and educational values will be degraded over what is planned since "low cost" camping and proposed walking trails will front on mudflats rather than on wetland marsh. We note that the highest price camping lots at "Campland on the Bay" overlook wetland.
 - d. DeAnza Natural Plan gives no specific designs for tidal channels to be created in the wetland area west of Rose Creek, continuing the current situation where the marsh is starved of freshwater and sediment. A better solution would be to design a channel distributary network to come off Rose Creek at the site of present-day Campland on the Bay so that at least some of the freshwater runoff, dissolved pollution and sediment from Rose Creek can be delivered to the wetland west of Rose Creek.
 - e. The Preferred Plan minimizes both the length of tidal creeks and the ability of the wetland to grow sufficiently to provide cover for larval fish. We have estimated that the value of halibut alone raised in wetland channels the size of those envisioned by the ReWild "Wildest" Plan at nearly \$1 million/year. The Preferred Plan forgoes much of this benefit to recreational fisheries in San Diego.

Please discuss the scientific evidence that a fragmented wetlands design such as De Anza Natural can function as a natural wetland and provide the benefits described above, in the short-, medium- or long-term.

S3-12

The De Anza Natural Preferred plan continues the current situation of a channelized Rose Creek that can and will eventually flood the Mission Bay Golf Course and Mission Bay High School as well as private homes and apartment complexes in the area. The Plan is a missed opportunity to protect public and private infrastructure by de-channelizing Rose Creek into a series of tidal distributary channels that would slow down flooding of areas adjacent to the creek due to the combination of storm surges, King tides and future sea level rise. The CA Coastal Act (Chapter 3) strongly favors such nature-based solutions to coastal flood risk.

S3-13

acknowledges that, due to lack of detail and site design in the PEIR, many future projects will undergo site-specific CEQA review, which is the appropriate time to evaluate site-specific impacts.

Further, this comment states that without specific details the project and its alternatives cannot be analyzed with regard to whether they can actually provide habitat expansion. Please refer to response to comment S3-9.

S3-11: This comment states that fragmented wetland design east of Rose Creek is flawed for several reasons, which are then listed. Please refer to response to comment S3-9. As discussed in the PEIR Chapter 3.0, Project Description, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. The recommendations identified in the comment would be more appropriate to submit for consideration during future project-level review.

S3-12: This comment states that the Plan is a missed opportunity to protect public and private infrastructure by de-channelizing Rose Creek into a series of tidal distributary channels that would slow down flooding of areas adjacent to the creek due to the combination of storm surges, King tides, and future sea level rise. As discussed in PEIR Chapter 3.0, Project Description, the project would expand the project area's natural habitat and improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect the City against the risk of climate change in line with the City's Climate Resilient SD Plan. Section 5.7, Hydrology and Water

Quality, concluded that the restored wetlands would increase resilience by providing increased opportunity for diversion of flood flows into the new enhancement areas compared with existing impervious conditions, which would reduce the risk of flooding. A Sea Level Rise Assessment Technical Report has been prepared for the project and has been incorporated into the Final PEIR as Appendix N. The report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise scenario. The Sea Level Rise Assessment Technical Report will influence future design.

S3-13: This comments states that the California Coastal Act (Chapter 3) favors nature-based solutions to coastal flood risk and requests analysis of how the proposed project and each alternative will meet project objective 3 and reduce flood risk to the surrounding area. As discussed in PEIR Chapter 3.0, the project would expand natural habitat and improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect the City against the risk of climate change in line with the City's Climate Resilient SD Plan. Please refer to response to comment S-12. The PEIR identifies a reasonable range of alternatives pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6. PEIR Chapter 8.0, Alternatives, evaluates four alternatives that would reduce impacts compared to the proposed project (No Project/No Build Alternative, Wetlands Optimized Alternative, Enhanced

S3-13 cont. In fact, section 30253 of the CA Coastal Act prohibits new coastal development from requiring "construction of protective devices" (sea walls, etc.) to prevent erosion. In the final PEIR, please include an analysis of how De Anza Natural and each Alternative meets Objective 3 ("Incorporate climate adaptation strategies to increase resilience to climate change and mitigate potential sea level rise impacts."), specifically the flood risk to the surrounding area and how each plan will mitigate that risk without the "construction of protective devices" that the CA Coastal Act specifically prohibits.

S3-14 Please compare the contribution of each alternative to supporting wetland-based passive/educational recreation, fish production/fishing opportunities, and sequestering carbon.

4. Sea level rise.

The DEIR does not identify any areas of littoral transition ecotone or uplands into which the saltmarsh can migrate to provide resiliency and preserve habitats, in spite of priority in the NRMP:

"Rising sea level would result in existing intertidal areas becoming subtidal areas; thereby, creating a need for existing upland areas being available to become future intertidal areas. These measures do not conflict with existing recreational use or leaseholder activities in Mission Bay Park".

S3-15 This means that neither the DeAnza Natural Plan nor the alternatives can be assessed for their resiliency. Please add these necessary details.

The DEIR does not analyze the impact of sea level rise. The City applied for and received funding from the Regional Water Quality Control Board for this land use proposal through R9-2020-0150 SEP. In this funding arrangement the city agreed to include

"the establishment of 80 acres of additional functional wetlands (low-mid-high wetland/soft marsh and mudflats), in addition to the [existing 40 acres currently located within the] Kendall-Frost Marsh/Northern Wildlife Preserve, at the Year 2100 based on current models utilized by the City for sea level rise projections". [note the use of 40 acres of wetlands, not the 88 that the city is using for its planning.]

We request that the city includes appropriate sea level rise analyses for all the proposed alternatives, as required by the RWQCB SEP, before this plan is considered further.

S3-16 5. Hydrology - Flooding. The DeAnza Natural Plan continues the current situation of a channelized Rose Creek that can and will eventually flood the Mission Bay Golf Course and Mission Bay High School as well as private homes and apartment complexes in the area, particularly the Crown Point Villas and Cedar Shores. In the vicinity of the city's Northern Wildlife Preserve Extension Parcel (directly south of Pacific Beach Drive), flooding already occurs during the annual combination of high tides and heavy rainfall, and is exacerbated by the Noyes Street storm drain outfall being below sea level. The Plan is a missed opportunity to protect public and private infrastructure by de-channelizing Rose Creek into a series of tidal

Wetlands/Optimized Parkland Alternative, and Resiliency Optimized Alternative). The PEIR goes above the requirements of CEQA by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b). PEIR Chapter 8.0 includes a discussion of each project alternative in relation to the project objectives. No revisions to the PEIR are warranted.

S3-14: This comment requests the comparison of each alternative's contribution to supporting wetland-based passive/educational recreation, fish production/fishing opportunities, and sequestering carbon. According to CEQA Guidelines, Section 15126.6(b), the alternatives discussion should focus on those alternatives that, if implemented, could eliminate or reduce any of the significant environmental impacts of a project. PEIR Chapter 8.0, Alternatives, evaluates the project alternatives to determine if they would eliminate any significant adverse environmental impacts of the project or reduce those impacts to a below a significant level. Project-related and cumulative impacts are those identified prior to the incorporation or implementation of any mitigation measures. As described in PEIR Chapter 5.0, Environmental Analysis, the proposed project would result in potentially significant impacts, prior to mitigation, for the following issues topics: biological resources; hazards and hazardous materials; historical, archaeological, and Tribal Cultural Resources (TCRs); paleontological resources; and noise. The project would result in potentially significant cumulative impacts, prior to mitigation, for the following issue topics: historical, archaeological, and TCRs. The performance of an alternative relative to a project is evaluated to determine the "comparative merits of the alternative" (CEQA Guidelines,

Section 15126.6[a]). The alternatives analysis is based on a comparison to the proposed project's impacts, as required by CEQA. The additional alternatives analysis requested in the comment is not required under CEQA. Therefore, no revisions to the Draft PEIR are warranted.

S3-15: This comment requests the PEIR incorporate details related to resiliency and sea level rise, as required by the Regional Water Quality Control Board (RWQCB) SEP. As stated in PEIR Chapter 3.0, Project Description, the project would expand the project area's natural habitat and improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect the City against the risk of climate change in line with the City's Climate Resilient SD Plan. A Sea Level Rise Assessment Technical Report has been prepared for the project and the Wetland Optimized Alternatives and has been incorporated into the Final PEIR as Appendix N in accordance with the SEP. The SEP does not require the analysis of other project alternatives pursuant to CEQA. The PEIR goes above the requirements of CEQA by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b). Therefore, the PEIR addresses climate resiliency and sea level rise. No further revisions are warranted.

S3-16: The comment states that the Plan is a missed opportunity to protect public and private infrastructure by de-channelizing Rose Creek into a series of tidal distributary channels that would slow down flooding of areas adjacent to the creek due to the combination of storm surges, King tides and future sea level rise. Please refer to response to comment S3-12.

S3-16 cont.	distributary channels that would slow down flooding of areas adjacent to the creek due to the combination of storm surges, King tides and future sea level rise.
S3-17	The CA Coastal Act (Chapter 3) strongly favors such nature-based solutions to coastal flood risk. In fact, section 30253 of the CA Coastal Act prohibits new coastal development from requiring "construction of protective devices" (sea walls, etc.) to prevent erosion. <u>In the final PEIR, please include and analysis of how De Anza Natural and each Alternative meets Objective 3 ("Incorporate climate adaptation strategies to increase resilience to climate change and mitigate potential sea level rise impacts."), specifically the flood risk to the surrounding area, the existing Mission Bay storm drain infrastructure, and how each plan will mitigate that risk without the "construction of protective devices" that the CA Coastal Act specifically prohibits.</u>
S3-18	In addition, city agreed to use SEP funds to analyze the most extensive wetland alternative described in the most comprehensive feasibility study, which is the Wildest alternative found in the ReWild Mission Bay feasibility study. Therefore, <u>please explain why the Wetland Optimized is not the Wildest plan, or one with greater wetland extent, and provide the resulting study, as required by the RWQCB.</u>
S3-19	<p><u>6. Public Access.</u> The CA Coastal Act requires that there be public access to the shoreline in any new coastal development. In the De Anza Natural Plan, however, part of the shoreline is private lease-held land. The previous lease-holder was fined \$750,000 by the California Coastal Commission in Sept 2021 for restricting public access to the shoreline on these public trust state tidelands. Instead of privatizing the shoreline, the plan should create open space with a series of walking trails and boardwalks across the wetland to provide access to the coast. Providing improved public access has numerous benefits including:</p> <ol style="list-style-type: none"> a. A substantial increase in property value in southern Pacific Beach adjacent to the northern Mission Bay. We have estimated this increase in property value at over \$227 million dollars that comes from having unimpeded access to a wetland and the coast. b. Creating a public amenity in the form of a network of walking trails and boardwalks that expose visitors to the educational and public health value of the wetland. While trails are designed into the De Anza Natural Plan, these are directly adjacent to the "low-cost camping" facility, reducing their value for the public to engage directly with wildlife. <p>Private control of the coast also does not fully meet Project Objective 1 in the DEIR, particularly given the history of public exclusion by previous tenants. <u>Why is privatization of the coast included in the preferred plan?</u></p> <p><u>7. Kumevaay engagement</u></p> <p>Project Objective 2 is to "Foster opportunities for members of local Tribal nations to reconnect to De Anza Cove". <u>Please provide evidence of how the local Tribal nations have provided input into the planning process. Please provide the evaluation by local Tribal nations of how the Plan and each Alternative meets Objective 2. If members of the Tribal nations have not been involved in the planning or evaluation given Objective 2, please explain</u></p>
S3-20	

S3-17: This comment states that the California Coastal Act (Chapter 3) strongly favors nature-based solutions to coastal flood risk, and requests analysis of how the proposed project and each alternative will meet project objective 3 and reduce flood risk to the surrounding area. Please refer to response to comment S3-13.

S3-18: This comment requests explanation as to why the Wetlands Optimized Alternative is not the Wildest plan. The PEIR identifies a reasonable range of alternatives pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6. PEIR Chapter 8.0, Alternatives, evaluates four alternatives that would reduce impacts compared to the proposed project (No Project/No Build Alternative, Wetlands Optimized Alternative, Enhanced Wetlands/Optimized Parkland Alternative, and Resiliency Optimized Alternative). The PEIR goes above the requirements of CEQA by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b) in accordance with the RWQCB SEP. The ReWild Mission Bay "Wild," "Wilder," and "Wildest" alternatives are discussed in PEIR Section 8.2, Alternatives, Considered and Eliminated.

The MBPMP calls for a "balanced approach" (City of San Diego 2021a) with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project proposes 137.5

acres of active recreation, regional parklands, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

The "Wild" and "Wildest" alternatives would not fully consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5) because they lack sufficient site areas for a balance of land uses, including enough site area for recreation and low-cost visitor guest accommodation, and as a result, they would also not provide enough equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access (project objective 1). The "Wilder" and "Wildest" alternatives would also fail to meet project objective 5 because they would reduce the amount of area available for aquatic recreation uses, such as the enjoyment of open beach sand activities and boating.

Therefore, while all three of these alternatives would identify environmental uses, they would not consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5). These alternatives would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2) as the project would, and while these alternatives would provide bike and pedestrian pathways, they would not prioritize public access and connectivity to the extent that the project would, or activation of the shoreline (project objective 6). The three ReWild alternatives would not enhance public access or provide equitable access to De Anza Cove because of how those plans laid out the habitat design to reduce access to the cove's shorelines compared to the project.

Therefore, while these alternatives would meet project objectives 3 and 4 by incorporating climate adaptation strategies and embracing responsibility and stewardship of the environment, they would not meet most of the project objectives. Thus, they have been eliminated from further consideration. No changes to the PEIR are warranted.

S3-19: This comment states that the California Coastal Act requires there be public access to the shoreline in any new coastal development. As discussed in PEIR Chapter 3.0, Project Description, the project would enhance the existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations, active and passive recreational opportunities to enhance public use of the area, and improvements to access to recreational uses. Regional parkland would support activities such as picnicking, kiteflying, Frisbee games, informal sports, walking, jogging, children's play, bicycling, and skating. The existing regional parkland would be enhanced with recreational amenities and access to the multi-use path that connects the project area to points to the north, west, and east. A sandy beach area at the northern and western edges of De Anza Cove would be adjacent to the low-cost visitor guest accommodation use and the boating use. The proposed project components will provide public access to the coast. As further discussed in PEIR Chapter 3.0, the project is a plan amendment to the MBPMP. No development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. Please refer to response to comment S3-9 regarding the GDP process.

S3-20: This comment requests evidence of how the local Tribal nations have provided input into the planning process. As discussed in PEIR Section 5.6: Historical, Archaeological, and Tribal Cultural Resources, Tribal consultation in accordance with AB 52 was conducted in 2019 with Lisa Cumper, Tribal Historic Preservation Officer from the Jamul Indian Village and Clint Linton, Director of Cultural Resources from the Lipay Nation of Santa Ysabel. Additional consultation occurred in April 2023. The local Native American Kumeyaay community has expressed a high level of interest with regard to potential impacts to known resources in and around the project site. The Draft PEIR includes mitigation measures to reduce impacts related to inadvertent discoveries to a less than significant level. In addition, as discussed in PEIR Chapter 3.0, Project Description, the project would also include an Interpretive Nature Center, which would foster opportunities for members of local Tribal nations to reconnect to De Anza Cove. The consideration of a name change for the area is noted. No revisions to the PEIR are warranted.

S3-20 cont. who has the authority to evaluate Objective 2 and why the Tribal nations or their representatives have not been involved.
 We suggest that the following be options that should be evaluated by local Tribal nations

- a. Changing the De Anza name of the area from the Basque-Mexican adventurer to a Kumeyaay-inspired name
- b. Increase then scope of the nature interpretation center to a nature and Kumeyaay culture interpretation center

S3-21 8. Comprehensive planning
 The NRMP describes Mission Bay as having 27 miles of shoreline, 15.6 miles for public use, and 2500 acres of open water, most of which is designated for recreational use. The park as a whole has a significant amount of area for active recreation and very little for natural habitat (4% if mudflats and eelgrass beds are included).
 The plan for northeast Mission Bay still suffers from a too-close focus on the project area, without looking at the context. It does not emphasize the unique opportunities of this location, recognized and emphasized in the NRMP, namely to expand wetlands around the only remaining tidal marsh that conserves listed endangered species, where the major source of fresh water enters the bay, and where restoration of culturally significant sites, green infrastructure, and wildlife corridors up into the watershed along Rose Creek is possible.
 Natural habitat is in critically short supply, with 88 acres (of 4500 total) found entirely in the Kendall-Frost Marsh/Northern Wildlife Preserve. We need to zoom out. The goal of "balance" should be examined across all of Mission Bay rather than the small area of the NE corner.
 There is already significant acreage for active recreation in Mission Bay. Human uses that exist nowhere else or are in short supply include: wetland science center; non-motorized boat landing; blinds for studying shorebirds; clean water for fishing; mudflats where abundant shellfish can be collected sustainably; native wetland habitat where useful plants can be sustainably grown and harvested; quiet space for contemplation; safe overnight camping outside in nature; and a place for building an 'ewaa (house) or a wa pour ha kwaiyo (tule boat).
 The project should address these recreational and educational needs with a focus on the inclusion of previously excluded groups of people and a 21st century perspective that values human and environmental well-being.

S3-22 11. Technical details

S3-23

- a. The UCSD NRS Kendall-Frost Reserve building site (corner of Pacific Beach Drive and Crown Point Drive) is labeled as "Regional Parkland" (pages 3-9, 8-61, 8-67, 8-69) This is not accurate; this is the property of the University of California. The document refers to the "Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP)" throughout (starting on p. 5-1), without acknowledging that the Kendall-Frost Marsh Reserve is the property of the University of California San Diego Natural Reserve System. Please correct these errors.

S3-21: This comment states that the goal of balance should be examined across all of Mission Bay rather than the small area of the northeast corner. MBPMP and the NRMP are the overarching planning documents for Mission Bay. The project focuses on habitat enhancements within the boundaries of the project area as outlined in PEIR Chapter 2.0, Environmental Setting, in alignment with the goals of the MBPMP and NRMP. The project proposes to enhance 225.1 acres of wetlands in Mission Bay Park. It is not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats across all of Mission Bay. No revisions to the PEIR are warranted.

S3-22: This comment states that there is already significant acreage for active recreation in Mission Bay and the project should address recreational and educational needs with a focus on inclusion of previously excluded groups. MPBMP calls for a "balanced approach" with three components: recreation, commerce, and environment. Please refer to response to comment S3-19. The project would provide many aspects of ideas listed in the comment, including improving access to the park areas along the bay shoreline for residents and visitors, as well as an Interpretive Nature Center. As described in PEIR Chapter 3.0, Project Description, the project would provide a waterfront multi-use path that would provide users with shore access and would connect the project area to points to the north, west, and east to enhance public equitable access and increase connections to the surrounding communities. The multi-use path would be a feature for users to view the marshes and have distant views of Mission Bay. In addition, areas designated as Regional Parkland would include passive

recreation amenities such as overlooks, pathways, and picnic areas. No revisions to the PEIR are warranted.

S3-23: This comment states that the KFMR building site is incorrectly designated as Regional Parkland and that the PEIR does not acknowledge that it is University of California Natural Reserve System land. In response to this comment the following revisions to PEIR Section 2.3.1.1, Existing Land Uses, have been made.

The KFMR/NWP is approximately 88 acres consisting mostly of vegetated wetland. It is bordered to the west and north by residential development, to the east by Campland, and to the south by Mission Bay. The University of California, ~~San Diego~~, Natural Reserve System manages the KFMR, and the City manages the contiguous remainder of the marsh as the NWP.

S3-24	<p>b. p. 3-2: The KFMR/NWP is described as approximately 88 acres of "mostly vegetated" habitat. The KFMR (not including the upland) is 16 acres of intertidal marsh; the NWP is approximately 24 acres for a total of approximately 40 acres of emergent vegetated wetland. That must mean that the remaining 48 acres comprises mudflats and eelgrass beds. <u>Please confirm and clarify throughout the PEIR document and the Plan itself.</u></p>
S3-25	<p>c. Figure 9: are the MHPA (black dotted line), and KFMR/NWP (the purple line) boundaries just roughly drawn, or do they reflect actual rather arbitrary placements? For example, only the southern half of the NWP Preserve Extension Parcel is shown inside. <u>Is this intentional? If so, why?</u></p> <p>The upland area of the UC property (included within the Project Area red line, but outside the purple line), is technically within the KFM Reserve. <u>Please re-draw the figures for consistency and correct the acreages and the conclusions based upon these.</u> the</p>
S3-26	<p>d. Section 1.3.2 -- Responsible and Trustee Agencies</p> <p>The statewide University of California Natural Reserve System (UCNRS) is the Trustee Agency with regard to the Kendall-Frost Marsh Reserve (NOT University of California San Diego (UCSD)). The San Diego office of the UCNRS is where official communications need to be directed; please address all correspondence to: Kendall-Frost Marsh Reserve, c/o Natural Reserve System, UC San Diego, 9500 Gilman Drive, Mail code 0116, La Jolla, CA 92093-0116. nrs@ucsd.edu (N.B. Please do not send UC Natural Reserve System communications to the UCSD Planning Office or elsewhere on the UCSD campus. Doing so could delay or prevent appropriate communications.)</p> <p>Furthermore, our office has been excluded from many meetings concerning this Plan development in which our Trustee Agency status merits our inclusion. <u>Please contact us to discuss how to rectify this situation as this planning process progresses.</u></p>
S3-27	
S3-28	<p>e. Biological Technical Report</p> <p>The consultant has apparently mis-identified the seablite observed as <i>Suaeda californica</i> (found further north in California) and failed to identify the rather abundant <i>Suaeda esteroa</i>, a covered species. <u>Please re-do the maps, lists, impact analysis, and conclusions to reflect this error.</u></p>
S3-29	<p>f. Project boundary</p> <p>The mouth of Rose Creek is a critical component of this project and should be included within the MHPA boundary since dredging is no longer required for boat navigation.</p>
S3-30	<p>In the previous version of the Amendment description the "project" was the DeAnza SSA, and the remainder of what is now shown as the project was the study area. Then it made sense to include the UC Regents' property in the study area, and to call the whole effort a "programmatic EIR." Now, however, the former "study area" has become the "project", including the Kendall-Frost Marsh Reserve. We object to the UC property being included without the involvement of the NRS. Furthermore, the Northern Wildlife</p>

S3-24: This comment states that vegetation located on KFMR/NWP is incorrectly described as mostly vegetated habitat. However, as stated in PEIR Chapter 3.0, Project Description, the KFMR/NWP (as illustrated on PEIR Figure 2-3) is approximately 88 acres and bordered to the west and north by residential development, to the east by Campland, and to the south by Mission Bay. The KFMR/NWP mostly consists of vegetated wetland. This description is consistent with the habitat described in the comment, which includes intertidal marsh, emergent vegetated wetland, mudflats and eelgrass beds. Further, the project doesn't propose enhancements or improvements to the KFMR/NWP. No revisions to the Draft PEIR are warranted.

S3-25: This comment questions the lines delegating the MHPA and the KFMR/NWP on Figure 9. The comment also states that the identified upland area of the UC property (included within the Project Area red line, but outside the purple line), is technically within the KFMR and should be updated. It is unclear which figure the commenter is referring to, as there is no Figure 9 in the Draft PEIR. Therefore, no further response is required.

S3-26: This comment states the PEIR incorrectly identifies the University of California San Diego as a trustee agency. In response to the comment the following revisions to PEIR Section 1.3.2, Responsible and Trustee Agencies, have been made:

Implementation of the project may require subsequent actions involving responsible and trustee agencies. Responsible agencies, as defined by CEQA Guidelines, Section 15381, are public agencies that may have discretionary approval authority for a project, and include but are not limited to the U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), California Department of Transportation, California Coastal Commission (CCC), and San Diego RWQCB. Trustee agencies are defined in Section 15386 of the CEQA Guidelines as agencies that have jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California, including the California State Lands Commission (Commission) and ~~University of California, San Diego (UC San Diego)~~ University of California Natural Reserve System.

1.3.2.7 University of California Natural Reserve System ~~University of California, San Diego~~

~~UC San Diego~~ The University of California Natural Reserve System owns manages approximately 16 acres of the Kendall-Frost Marsh Reserve. As early as 1942, students and faculty at the Scripps Institution of Oceanography were using the Mission Bay marshes as educational and research sites. The Kendall-Frost Marsh Reserve is protected by chain-link fencing along its upper boundary with City streets and by the property owners' fences along its

boundary with the Crown Point Villas. The lower boundary with the City's Northern Wildlife Preserve is not marked because the contiguous wetland (40 acres) is managed as a whole, with the University of California UC San Diego Natural Reserve System coordinating research and teaching use, and the City's Parks and Recreation Department responsible for law enforcement (UC San Diego 2022).

The City acknowledges this role and looks forward to future consultation with University of California Natural Reserve System as future site-specific projects are identified through the GDP process.

S3-27: This comment states that University of California Natural Reserve System has been excluded from many meetings concerning this Plan and being a Trustee Agency merits inclusion. This City acknowledges the role as a Trustee Agency and looks forward to further consultation with the University of California Natural Reserve System as future site-specific projects are identified through the GDP process. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft PEIR. Therefore, no further response is warranted.

S3-28: This comment states the Biological Technical Report has mis-identified the seablite observed as *Suaeda californica* (found further north in California) and failed to identify the rather abundant *Suaeda esteroa*, a covered species and states the analysis should be updated.

As discussed in Section 4.2.2, Plant and Wildlife Species Observations (2022 Harris Surveys) of the Biological

Resources Technical Report (BRTR), any sensitive plant and wildlife species documented during previous studies conducted in the project area but not observed during the 2022 surveys were reviewed and included in the species observed lists and discussions as deemed appropriate. The sources of these previous observations are included in Appendix B of the BRTR and the sensitive species discussions to differentiate them from the 2022 species observations. Furthermore, under the discussion of California Seablite (*Suaeda californica*) in Section 5.4.2.1, Sensitive Plant Species Observed, of the BRTR states California seablite was observed in the southern coastal salt marsh of the KFMR/NWP during the 2016 biological surveys. This species' presence in the KFMR/NWP was not confirmed during the 2022 surveys. However, no focused sensitive plant survey was conducted, and this species could have gone unidentified. An unidentified species of *Suaeda* was observed in the western portion of KFMR/NWP during the October 2022 survey.

Furthermore, PEIR Section 5.3, Biological Resources, states that four sensitive plant species were detected in the project area including Palmer's frankenia (*Frankenia palmeri*), San Diego marsh-elder (*Iva hayesiana*), southwestern spiny rush (*Juncus acutus* ssp. *leopoldii*), and California seablite (*Suaeda californica*). In addition, the PEIR states that two sensitive plant species, estuary seablite (*Suaeda esteroa*) and Nuttall's acmispon (*Acmispon prostratus*), were determined to have a high potential to occur in the project area but were not identified during the biological resources surveys. The PEIR concludes that there is potential for California seablite (*Suaeda californica*), Palmer's Frankenia (*Frankenia palmeri*), and estuary seablite (*Suaeda esteroa*) to occur in the project

construction, enhancement, and hydrologic restoration areas that include these species' suitable habitat, the KFMR/NWP. In the event these sensitive plant species are identified within the potential impact area, direct impacts are considered potentially significant. The PEIR mitigation strategy adequately addresses potential impacts to these species. No revisions to the PEIR are warranted.

S3-29: This comment states that the mouth of Rose Creek is a critical component of this project and should be included within the MHPA boundary. As shown in PEIR Figure 3-1, the mouth of Rose Creek is located within the project boundary. This project does not have the authority to add land to the City's MHPA boundary. No revisions to the PEIR are warranted.

S3-30: This comment states objection to the University of California property being included without the involvement of the University of California Nature Reserve System. The project does not propose enhancements or improvements to the KFMR/NWP. PEIR Section 3.3.1.1 states that the project includes enhancement and restoration within the existing KRMR/NWP and the expansion of wetlands currently occupied by Campland. The City acknowledges the University of California Natural Reserve role as a Trustee Agency and looks forward to further consultation with the University of California Natural Reserve System as future site-specific projects are identified through the GDP process. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft PEIR. Therefore, no further response is warranted.

S3-31

Preserve Extension Parcel is also within the project, and the details of the long delayed (since its acquisition in 1992) plans for the restoration of that filled area as a precursor to its integration into the ecosystem is a critical component in connecting the Marsh to Rose Creek and buffering it from urban impacts. The EIR is now a Project Level EIR and must include the details that CEQA requires.

Sincere regards,

(Titles for identification purposes only)



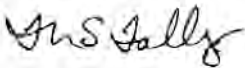
Isabelle Kay
Reserves Manager, UCSD Natural Reserve System



Heather Henter, Ph.D.
Executive Director, UCSD Natural Reserve System



Richard Norris, Ph.D.
Distinguished Professor of Paleobiology, Scripps Institution of Oceanography
Faculty Director, UCSD Natural Reserve System



Theresa S. Talley, Ph.D.
California Sea Grant Extension Specialist

S3-31: This comment states that the PEIR is a project EIR and not a Program EIR. The project is an Amendment to the Mission Bay Park Master Plan. As discussed in PEIR Chapter 1.0, Introduction, the project analyzed in this PEIR is an amendment to the MBPMP, which is a comprehensive planning document that provides a policy framework to guide development throughout Mission Bay. The project includes recommendations pertaining to the project area to serve local and regional recreation needs while preserving the natural resources of the De Anza Cove area. No specific development is currently being proposed. Please refer to response to comment S3-9. The appropriate CEQA document to address the project is a PEIR. No revisions to the Draft PEIR are warranted.



Matthew T. Costa, Ph.D.

Postdoctoral Research Associate, Northeastern University

Visiting Scholar, Scripps Institution of Oceanography, UCSD

Comment Letter L1: San Diego Unified School District, March 7, 2023

L1

From: [Hudson, Sarah](#)
To: [PLN_PlanningCEQA](#)
Cc: [Rosa-Rosino, Garcia-Craoson, Paul](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan Draft PEIR
Date: Tuesday, March 7, 2023 11:43:43 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Good morning,

San Diego Unified School District submits this official comment on the De Anza Natural Amendment to the Mission Bay Park Master Plan Draft Program Environmental Impact Report (PEIR):

The Draft PEIR indicates that the De Anza Natural Amendment does not include any residential land use. Therefore, San Diego Unified School District anticipates no impact to school service, enrollment, capacity, or facilities.

Thank you for your time.

Sarah Hudson
Demographer, San Diego Unified School District
Instructional Facilities Planning Department
Telephone (619) 725-7368
shudson@sanill.net
https://www.sandiegounified.org/departments/instructional_facilities_planning

From: Moore, Jordan <JTL Moore@sanidieo.gov> **On Behalf Of** PLN_PlanningCEQA
Sent: Monday, March 6, 2023 5:23 PM
To: PLN_PlanningCEQA <planningceqa@sanidieo.gov>
Subject: Notice of Availability of a Draft Amendment and Draft PEIR for the De Anza Natural Amendment to the Mission Bay Park Master Plan - Public Notice Date March 6, 2023

NOTICE OF AVAILABILITY OF A DRAFT AMENDMENT AND DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

Please see the attached Notice of Availability of a Draft Amendment and Draft Program Environmental Impact Report for the De Anza Natural Amendment to the Mission Bay Park Master Plan, which was distributed for public review starting today, March 6, 2023.

The public review and comment period for the Draft Program Environmental Impact Report will end on **Thursday, April 20, 2023**.

Thank you,

CEQA & Environmental Policy Section

L1-1: This comment states that the De Anza Natural Amendment to the Mission Bay Park Master Plan (project) does not include any residential land uses; therefore, the San Diego Unified School District anticipates no impact to school service, enrollment, capacity, or facilities. The City of San Diego (City) appreciates the San Diego Unified School District's participation in the review of the Program Environmental Impact Report (PEIR) for the project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

L1-1

City of San Diego Planning Department



Comment Letter L2: County of San Diego, Department of Environmental Health and Quality, Vector Control Program, April 19, 2023

L2

L2-1: The comment is a cover email stating that the comment letter is attached. The comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

From: [Sandel, Scott](#)
To: [PLN_PlanningCEQA](#)
Subject: FW: De Anza Natural Amendment to the Mission Bay Park Master Plan
Date: Wednesday, April 19, 2023 9:43:09 AM
Attachments: [CEQA MND](#) [DeAnza.pdf](#)

Scott Sandel

619.235.5204
ssandel@sandiego.gov

From: Valdez, Daniel <Daniel.Valdez@sdcounty.ca.gov>
Sent: Tuesday, April 18, 2023 5:10 PM
To: Sandel, Scott <SSandel@sandiego.gov>
Cc: Hines, Colleen <Colleen.Hines@sdcounty.ca.gov>; Bennett, Mary <Mary.Bennett@sdcounty.ca.gov>; Ippolito, Sharon <Sharon.Ippolito@sdcounty.ca.gov>; Edwards, Dominique <Dominique.Edwards@sdcounty.ca.gov>; Gurfield, Nikos <Nikos.Gurfield@sdcounty.ca.gov>
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello Mr. Sandel,

Please see attached for our CEQA project comments.

Thank you,

Daniel Valdez | Registered Environmental Health Specialist
County of San Diego | Vector Control Program
(858) 688-3722 | www.SDvector.com | MS: 0565
Schedule: T-F, 7:00 – 5:30 PM

Help us make sure our customers have a positive experience. Please take 60 seconds to provide us with your [feedback](#).

L2-1



County of San Diego

AMY HARBERT
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH AND QUALITY
VECTOR CONTROL PROGRAM
5670 OVERLAND AVENUE, SUITE 102, SAN DIEGO, CA 92123
Phone: (619) 694-2899 Fax: (619) 536-6786
www.SDVector.com

HEATHER BUONOMO, REHS
DIRECTOR OF ENVIRONMENTAL HEALTH

April 14, 2023

Scott Sandel, Park Designer
Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123

Via e-mail: SSandel@sandiego.gov

COMMENTS ON THE DE ANZA NATURAL AMENDMENT TO THE MISSION BAY PARK
MASTER PLAN

Dear Mr. Sandel:

L2-2

Thank you for the opportunity to comment on the Draft Amendment and Draft Program Environmental Impact Report for the above referenced project. The County of San Diego Department of Environmental Health and Quality (DEHQ) Vector Control Program (VCP) and Land and Water Quality Division (LWQD) have completed review of the proposed project and have comments as noted below.

The VCP is responsible for the protection of public health through the surveillance and control of mosquitoes that are vectors for human disease including West Nile virus (WNV). The VCP has the following comments:

L2-3

1. The VCP respectfully requests that the Draft Amendment and Draft Program Environmental Impact Report address potential impacts from possible mosquito breeding sources created by the project and that the project be designed and constructed in a manner to minimize those impacts. Specifically, ensure construction-related depressions created by grading activities, vehicle tires, and excavation do not result in depressions that will hold standing water. In addition, ensure drains, BMPs, wetland areas, stormwater capture systems, and other structures do not create a potential mosquito breeding source. Any area that is capable of accumulating and holding at least 1/2 inch of water for more than 96 hours can support mosquito breeding and development. Finally, if habitat remediation is required for the project, the design should be consistent with guidelines for preventing mosquito habitat creation.

L2-4

2. Please note, the VCP has the authority pursuant to state law and County Code to order the abatement of any mosquito breeding that does occur either during construction or after the project is completed that is determined to be a vector breeding public nuisance. The VCP will

"Environmental and public health through leadership, partnership and science"

L2-2: The comment discusses the County of San Diego Department of Environmental Health and Quality Vector Control Program's (VCP's) responsibility for the protection of public health. The City of San Diego (City) appreciates the VCP's participation in the review of the PEIR for the project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

L2-3: This comment requests that the PEIR address potential impacts from possible mosquito breeding sources created by the project and that the project be designed and constructed in a manner to minimize those impacts. PEIR Section 5.7, Hydrology and Water Quality, includes a list of potential construction best management practices to avoid impacts to water quality. These best management practices include design concepts to drain to permeable sources, and to employ integrated pest management principles, both of which would help prevent impacts related to mosquitos. However, as discussed in Chapter 3.0, Project Description, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. Furthermore, the PEIR acknowledges that the City will evaluate future detailed General Development Plans for future projects as they are developed and will provide precise engineering and construction plans for the various elements of the project. Because these plans are currently not available at the planning level, their environmental impacts have been estimated at the program level, and a mitigation strategy has been developed that would apply to future

improvements. Once the project design has been completed, prior to approval, the City will route the future project through the Public Project Assessment process, which includes the preparation of the appropriate environmental documentation in accordance with California Environmental Quality Act (CEQA). At that time, specific mitigation measures will be developed based on the site-specific impacts of the proposed General Development Plan and the mitigation strategy outlined in the PEIR. At this point, public and agency comments will be invited to address the site-specific impacts identified in the future CEQA documentation. As future projects are proposed, the City will consider the VCP's construction-related recommendations to avoid creation of mosquito breeding areas. No revisions to the PEIR are warranted.

L2-4: This comment states that the VCP has the authority pursuant to state law and County Code to order the abatement of any mosquito breeding that occurs during project construction or after the project is completed. The City acknowledges the VCP's authority pursuant to state law and County Code to order the abatement of any mosquito breeding areas that are determined to be a vector breeding public nuisance. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

Mr. Sandel
April 14, 2023
City of San Diego

L2-4 cont. exert that authority as necessary to protect public health if the project is not designed and constructed to prevent such breeding.

L2-5 3. For your information, the County of San Diego Guidelines for Determining Significance for Vectors can be accessed at http://www.sandiegocounty.gov/content/dam/sdc/pds/docs/vector_guidelines.pdf and the California Department of Public Health Best Management Practices for Mosquito Control in California is available at <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/MosquitoesandMosquitoBorneDiseases.aspx#>

L2-6 The LWQD noted that the Draft PEIR states that the DEHQ Hazardous Materials Division (HMD) is the local Certified Unified Program Agency (CUPA) regarding investigation and cleanup of contaminated sites. Although HMD is the CUPA, HMD does not oversee investigation and cleanup of contaminated sites. The LWQD Site Assessment and Mitigation Program is responsible for oversight of contaminated sites, primarily through the Voluntary Assistance Program. Given the likelihood of encountering contaminated soil during grading/excavating, the LWQD recommends preparation of a Soil Management Plan and Community Health and Safety Plan prior to grading/excavating activities at the site. If contaminated soil/groundwater is encountered, cleanup oversight is recommended. The DEHQ LWQD, San Diego Regional Water Quality Control Board, and Department of Toxic Substances Control have voluntary cleanup programs for oversight of soil/groundwater remedial activities.

L2-7 The VCP and LWQD appreciate the opportunity to participate in the environmental review process for this project. If you have any questions regarding the VCP comments, please contact Daniel Valdez at 858-688-3722 or by e-mail at Daniel.Valdez@sdcounty.ca.gov. If you have any questions regarding the LWQD comment, please contact Colleen Hines at 858-505-6874 or by email at Colleen.Hines@sdcounty.ca.gov.

Sincerely,



DANIEL VALDEZ, Registered Environmental Health Specialist
Vector Control Program

L2-5: The comment provides a link to the County of San Diego Guidelines for Determining Significance for Vectors. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

L2-6: This comment states that the Land and Water Quality Division (LWQD) Site Assessment and Mitigation Program is responsible for oversight of contaminated sites, primarily through the Voluntary Assistance Program, and recommends preparation of a Soil Management Plan and Community Health and Safety Plan prior to grading/excavating activities on the site. In response to this comment, the following revisions to the Final PEIR Section 5.5, Hazards and Hazardous Materials, have been made:

Any contaminated soil shall be removed and disposed of in accordance with requirements by the County of San Diego Department of Environmental Health and Quality Land and Water Quality Division Site Assessment and Mitigation Program Hazardous Materials Division, which is the local Certified Unified Program Agency regarding investigation and cleanup of contaminated sites.

The PEIR includes MM HAZ 5.5-2, Soil Sampling, which requires that, prior to any construction or grading activities in areas of documented soil staining and contaminated soil, construction contractors shall complete soil sampling to determine whether contamination is present. If elevated concentrations of contaminants (e.g., petroleum compounds, metals, hazardous waste) are present in on-site soils, contaminated soil shall be removed and disposed. In

response to this comment, MM HAZ 5.5-2, Soil Sampling, has been revised as follows in the Final PEIR:

MM HAZ 5.5-2 Soil Sampling. Prior to any demolition, construction, or grading activities in areas of documented soil staining and contaminated soil, including in the vicinity of the former De Anza Cove mobile home park Boneyard, former Campland on the Bay area underground storage tanks, Mission Bay Golf Course hydraulic lift, and electrical transformers, construction contractors shall complete soil sampling to determine whether contamination is present. If elevated concentrations of contaminants (e.g., petroleum compounds, metals, hazardous waste) are present in on-site soils, contaminated soil shall be removed and disposed in accordance with requirements of the County of San Diego Department of Environmental Health and Quality Land and Water Quality Division Site Assessment and Mitigation Program ~~Hazardous Materials Division~~, which is the local Certified Unified Program Agency regarding investigation and cleanup of contaminated sites.

In addition, MM HAZ 5.5-3, Contingency Plan, has been revised as follows in the Final PEIR:

MM HAZ 5.5-3 Contingency Plan. Prior to the issuance of any demolition, construction, or grading permits, the project engineer shall ensure that a hazardous material contingency plan is prepared and reviewed to specify procedures for the

management of potentially impacted soil (and groundwater) encountered during project construction or demolition. If elevated concentrations of contaminants are detected (i.e., soil discoloration, odor, petroleum sheen, positive photoionization detector readings) in on-site soils during grading and excavation, contaminated soil shall be removed and disposed of in accordance with requirements by the County of San Diego Department of Environmental Health and Quality Land and Water Quality Division Site Assessment and Mitigation Program ~~Hazardous Materials Division~~.

- L2-7:** This comment includes the commenter's name, role, and contact information. This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is warranted

Comment Letter L3: City of San Diego, Public Utilities Department, April 19, 2023

L3

From: [Frick, Lindsey](#)
To: [PLN Planning/EOA](#)
Cc: [Moore, Jordany](#); [Smith, Dirk](#)
Subject: De Anza Natural Amendment to the Mission Bay Park Master Plan EIR - PUD comments
Date: Wednesday, April 19, 2023 2:20:56 PM

Hello Jordan,

L3-1

On behalf of the Public Utilities Department, we find that the proposed project implantation poses no significant impact to the City's major sewer and water facilities, nor does it pose a significant increase demand for our services. We have no comments on the proposed plan amendment.

Thank you,
Lindsey

Lindsey Frick
Associate Planner
City of San Diego
Public Utilities Dept.
EPM | Environmental

T (858) 292-6459
LFrick@sandiego.gov



L3-1: This comment states that the City of San Diego (City) Public Utilities Department finds that the De Anza Natural Amendment to the Mission Bay Park Master Plan (project) would pose neither a significant impact on the City's major sewer and water facilities nor a significant increase in demand for those services. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR). Therefore, no further response is warranted.

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Comment Letter L4: San Diego Unified School District, April 20, 2023

L4

From: [Hudson Sarah](#)
To: [P.U. Planning/CEQA](#); [Sandell, Scott](#)
Cc: [Garcia-Crawshaw, Paul](#); [Rosa, Rosalva](#)
Subject: [EXTERNAL] Comment on the De Anza Cove Amendment to the Mission Bay Park Master Plan
Date: Thursday, April 20, 2023 4:06:29 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello,

Please accept this comment on behalf of San Diego Unified School District:

"Use of the De Anza Cove should seek educational opportunities to partner with public schools in the vicinity."

SDUSD looks forward to future collaboration. Thank you.

Sarah Hudson

Demographer, San Diego Unified School District
Instructional Facilities Planning Department
4100 Normal Street, Room 3150
San Diego, CA 92103-2682
Telephone (619) 725-7369
Fax (619) 293-8320
shudson@sandi.net
https://www.sandiesunified.org/departments/instructional_facilities_planning

L4-1: This comment states that the use of De Anza Cove should seek educational opportunities to partner with public schools within the vicinity. The City of San Diego (City) appreciates the San Diego Unified School District's participation in the review of the Program Environmental Impact Report (PEIR) for the De Anza Cove Amendment to the Mission Bay Park Master Plan (project). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

L4-1

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Comment Letter L5: San Diego Regional Water Quality Control Board, May 5, 2023



L5

L5-1: This comment is introductory in nature with specific comments to follow. Therefore, no further response is warranted.

San Diego Regional Water Quality Control Board

May 3, 2023

Attn: Heidi Vonblum
Planning Director
City of San Diego Planning Department
9485 Aero Dr, M.S. 413
San Diego, CA 92123

Subject: De Anza Natural (Project), Draft Program Environmental Impact Report (DPEIR), SCH #2018061024

Dear Planning Commission Staff:

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) received a Notice of Availability of a DPEIR from the City of San Diego (City) for the subject Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines and submits the following comments. The San Diego Water Board would like to thank the City for granting a two week extension to provide comments on the DPEIR. The San Diego Water Board previously submitted comments in response to the Notice of Preparation (NOP) of the DPEIR in 2022.

The San Diego Water Board appreciates the opportunity to comment on the DPEIR, and fully supports the City's planning efforts to develop a De Anza Natural alternative for the DPEIR that goes above and beyond the requirements of CEQA. By studying the expanded wetlands alternative to the same level of detail as the City's proposed project, the City Council and community will better understand the long-term benefits of maximizing the wetland acreage created in this unique area of Mission Bay.

In this letter we provide comments on the DPEIR, and first bring to your attention shortcomings in the DPEIR analysis that could trigger a substantial breach of a stipulated settlement order of the Water Board. As described below in Section 1, failure to meet the Settlement Order's terms could require the City to repay the State Water Resources Control Board a substantial amount of the deferred liability.

L5-1

CHRISTIE CANTO, CHAIR | DAVID GIBSON, EXECUTIVE OFFICER

2875 Northside Drive, Suite 100, San Diego, CA 92108-2700 | www.waterboards.ca.gov/sandiego

SAN DIEGO WATER BOARD ROLE

The San Diego Water Board is charged with the protection of the Waters of the State of California in the San Diego Region. Our Mission is to preserve, enhance, and restore the quality of California's water resources for the protection of the environment, public health, and all beneficial uses. The San Diego Water Board is a responsible agency under CEQA, and administers regulations established by the Federal Clean Water Act and the California Water Code (Porter-Cologne Water Quality Control Act). The San Diego Water Board also administers regulations, plans, and policies established by the Water Quality Control Plan for the San Diego Region (Basin Plan) and the State Water Resources Control Board to protect watersheds and their resources. The San Diego Water Board administers these regulations, in part, through issuance of water quality certifications under Clean Water Act (CWA) section 401. Implementation of the Project would result in the discharge of dredged or fill materials within Waters of the United States and Waters of the State and would require CWA section 401 water quality certification.

San Diego Water Board staff are also charged with conducting review and oversight of Settlement Order No R9-2020-0150 and the *Northwest Mission Bay Wetland Restoration* Supplemental Environmental Project (SEP).

On September 8, 2021, the San Diego Water Board adopted Resolution No. R9-2021-0007 supporting the implementation of the 2021 Practical Vision. One focus of the San Diego Water Board's 2021 Practical Vision¹ is to "Increase wetland area in the Region and regulate projects that alter wetland, stream, and riparian areas considering the affects to Tribal and underserved communities as well as Climate Change mitigation and adaptation." The restoration of Mission Bay wetlands is specifically identified in Chapter 3 of the Practical Vision: *Recover Stream, Wetland and Riparian Areas*, which seeks to support and encourage wetland restoration to achieve a meaningful net gain of wetlands in the San Diego region. The Practical Vision efforts followed the Board's stated support for the restoration of Mission Bay wetlands in Resolution R9-2015-0041, *Resolution to Support Restoration of Aquatic Ecosystems in the San Diego Region*.²

The comments listed below support the San Diego Water Board's mission, vision, regulatory functions, and enforcement oversight obligations:

1. DPEIR Compliance with Settlement Order No. R9-2020-0150

On October 21, 2020, the San Diego Water Board and the City entered into a Settlement Agreement and Stipulated Administrative Civil Liability (ACL) Order No. R9-2020-0150 (Order) in response to a 6,750,734 gallon sanitary sewer overflow to Tecolote Creek and Mission Bay. The Order stipulated the City pay a fine totaling \$2,541,874, with \$1,250,000 in deferred liability if the City successfully completed a Supplemental Environmental Project (SEP).

¹ The San Diego Water Board's 2021 Practical Vision can be found here [San Diego Water Board Practical Vision 2021](#)

² Resolution R9-2015-0041 can be found here [R9-2015-0041.pdf \(ce.gov\)](#)

L5-2: This comment provides background on the San Diego Water Board's mission and responsibilities, as well as its role in overseeing the Supplemental Environmental Project (SEP). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft PEIR, and no further response is warranted.

L5-3: This comment describes the San Diego Water Board's 2021 Practical Vision and how it relates to the forthcoming statements. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft PEIR, and no further response is warranted.

L5-4: This comment provides a background and summary of the SEP. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft PEIR, and no further response is warranted.

L5-2

L5-3

L5-4

Attachment B of the Order detailed the City's *Northeast Mission Bay Wetland Restoration SEP*. The City proposed a three-pronged approach, including assessments, environmental restoration, and protection to further the goals of native habitat restoration in northeast Mission Bay in order to improve water quality and beneficial uses by funding:

- a. Additional analysis and study of an expanded restoration alternative for the Programmatic Environmental Impact Report (PEIR) of the De Anza Cove Amendment to the Mission Bay Park Master Plan;
- b. Technical studies to supplement the Mission Bay Park Improvement Plan PEIR and Rose Creek Preliminary Engineering Report; and
- c. Planning and implementation of native habitat enhancement and restoration in the Kendall Frost Reserve.

On page 6 of the SEP proposal, the City described the expanded restoration alternative stating:

"This alternative would result in the establishment of 80 acres of additional functional wetlands (low-mid-high wetland/salt marsh and mudflats), in addition to the Kendall-Frost Marsh/Northern Wildlife Preserve, at the Year 2100 based on current models utilized by the City for sea level rise projections."

The current DPEIR fails to demonstrate whether and/or how the expanded restoration alternative results in the establishment of 80 acres of additional functional wetlands at the year 2100. Additionally, the DPEIR does not address the issue of sea level rise over time and the resulting impacts to restored wetlands, as required by the Order. Failure to provide a detailed sea level rise analysis is a serious omission and breach of the settlement terms and conditions, which could result in the San Diego Water Board seeking repayment of the deferred liability in accordance with Paragraph 18.n of the Order.

2. Climate Resiliency Analysis

The DPEIR states, "the low-risk aversion projections for San Diego are 3.6 feet by the year 2100, and the medium-high risk projections are 7 feet by the year 2100... The project is a habitat restoration project with recreational amenities. Future planning efforts can consider phasing of adaptation strategies to account for uncertainty around timing and extent of sea level rise. With implementation of the project, De Anza Cove is expected to experience lowered levels of inundation and velocities by 2100 compared to if the area is left in its current state as a result of proposed wetland restoration activities, which would increase resilience to sea level rise and coastal flooding. Restored wetlands increase resilience by providing an increased opportunity for flood flows to be diverted into the new enhancement areas compared with existing impervious conditions" (DPEIR, Page 5.7-2).

L5-5: This comment expresses concern that more detailed sea level rise analysis was not included in the draft PEIR for De Anza Natural and the Wetlands Optimized Alternative, before summarizing the sea level rise discussion included in the draft PEIR. This comment then goes on to state that The DPEIR must analyze both the City's Preferred Alternative and the Wetland Optimized Alternative utilizing the City's current sea level rise models over time. The comment states that the analysis must contain a comparison of the two alternatives, mapping the extent of wetlands through time at the intervals of the years 2030, 2050 and 2100, and that the analysis must provide assurances that the Wetlands Optimized Alternative would result in an additional 80 acres of additional wetland as required by the SEP.

A detailed Sea Level Rise Assessment Technical Report has been completed and incorporated into the Final PEIR as Appendix N. The Sea Level Rise Assessment Technical Report analyzes both the proposed project, De Anza Natural, and the Wetlands Optimized Alternative. The report confirms the Draft PEIR conclusions that the Wetlands Optimized Alternative would maintain over 80 acres of additional functional wetlands at the year 2100, as required by the SEP.

The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist at the year 2100 under a 7 foot sea level rise scenario. Please see Appendix N: Sea Level Rise Assessment Technical Report to review the full analysis.

L5-5 cont.	<p>The DPEIR must analyze both the City's Preferred Alternative and the Wetland Optimized Alternative utilizing the City's current sea level rise models over time. The analysis must contain a comparison of the two alternatives, mapping the extent of wetlands through time at the intervals of the years 2030, 2050 and 2100. The analysis must provide assurances that the Wetlands Optimized Alternative would result in an additional 80 acres of additional wetland as required by the SEP.</p>
L5-6	<p>The DPEIR should also describe the types of "adaptation strategies" that will be considered in future planning efforts associated with sea level rise uncertainty.</p> <p><u>Definition of a Wetland</u></p> <p>The DPEIR should clearly define what constitutes a wetland. The DPEIR should utilize Section 113.0103 of the San Diego Municipal Code which defines wetlands as indicated below:</p> <p>"Wetlands are defined as areas which are characterized by any of the following conditions:</p> <ol style="list-style-type: none"> 1. All areas persistently or periodically containing naturally occurring wetland vegetation communities characteristically dominated by hydrophytic vegetation, including but not limited to salt marsh, brackish marsh, freshwater marsh, riparian forest, oak riparian forest, riparian woodlands, riparian scrub, and vernal pools; 2. Areas that have hydric soils or wetland hydrology and lack naturally occurring wetland vegetation communities because human activities have removed the historic wetland vegetation or catastrophic or recurring natural events or processes have acted to preclude the establishment of wetland vegetation as in the case of salt pannes and mudflats; 3. Areas lacking wetland vegetation communities, hydric soils and wetland hydrology due to non-permitted filling of previously existing wetlands; 4. Areas mapped as wetlands on Map No. C-713 as shown in Chapter 13, Article 2, Division 6 (Sensitive Coastal Overlay Zone)." <p>The DPEIR lacks sufficient detail to determine the amount of the various wetland types (low-mid-high wetland/salt marsh and mudflats) and their associated acreage. The DPEIR should:</p> <ol style="list-style-type: none"> a. Clearly map the location and extent of upland transition zones for both the Preferred Alternative and the Wetland Optimized Alternative.
L5-7	<p>The DPEIR should clearly define what constitutes a wetland. The DPEIR should utilize Section 113.0103 of the San Diego Municipal Code which defines wetlands as indicated below:</p> <p>"Wetlands are defined as areas which are characterized by any of the following conditions:</p> <ol style="list-style-type: none"> 1. All areas persistently or periodically containing naturally occurring wetland vegetation communities characteristically dominated by hydrophytic vegetation, including but not limited to salt marsh, brackish marsh, freshwater marsh, riparian forest, oak riparian forest, riparian woodlands, riparian scrub, and vernal pools; 2. Areas that have hydric soils or wetland hydrology and lack naturally occurring wetland vegetation communities because human activities have removed the historic wetland vegetation or catastrophic or recurring natural events or processes have acted to preclude the establishment of wetland vegetation as in the case of salt pannes and mudflats; 3. Areas lacking wetland vegetation communities, hydric soils and wetland hydrology due to non-permitted filling of previously existing wetlands; 4. Areas mapped as wetlands on Map No. C-713 as shown in Chapter 13, Article 2, Division 6 (Sensitive Coastal Overlay Zone)." <p>The DPEIR lacks sufficient detail to determine the amount of the various wetland types (low-mid-high wetland/salt marsh and mudflats) and their associated acreage. The DPEIR should:</p> <ol style="list-style-type: none"> a. Clearly map the location and extent of upland transition zones for both the Preferred Alternative and the Wetland Optimized Alternative.
L5-8	<p>The DPEIR lacks sufficient detail to determine the amount of the various wetland types (low-mid-high wetland/salt marsh and mudflats) and their associated acreage. The DPEIR should:</p> <ol style="list-style-type: none"> a. Clearly map the location and extent of upland transition zones for both the Preferred Alternative and the Wetland Optimized Alternative.

L5-6: This comment states that the PEIR should describe the types of "adaptation strategies" that will be considered in future planning efforts. The Sea Level Rise Assessment Technical Report that has been completed and incorporated in the Final PEIR includes a detailed discussion of adaptive management considerations that should be taken into consideration when implementing the proposed project and future planning efforts in this area. Please see Appendix N for further detail.

L5-7: This comment states that the PEIR should clearly define what constitutes a wetland, and summarizes SDMC Section 113.0103. The habitat types as defined in the PEIR are categorized consistent with the City's Biology Guidelines (2018) to determine potential impacts and associated mitigation ratios. Please see Appendix B: Biological Resources Technical Report, Section 4.2.3 for further detail on how the PEIR defines a "wetland" pursuant to the City of San Diego Biology Guidelines. In response to this comment Sections 3.3.5 and 4.2.3 of the Biological Resources Technical Report, which discuss the City's definition of wetlands, have also been revised to refer to SDMC Section 113.0103.

L5-8: This comment states that the PEIR lacks sufficient detail with regards to various wetlands types, and requests that the PEIR include more detailed maps of: upland transition zones for De Anza Natural and the Wetlands Optimized Alternative; wetland types and acreages for the Wetlands Optimized Alternative; and areas of wetland type conversion. The Sea Level Rise Assessment Technical Report that has been completed and incorporated in the Final PEIR as Appendix N includes maps, tables, and figures containing such information for both De Anza Natural and the Wetlands Optimized Alternative. Please see Appendix N for further detail.

L5-8
cont.

- b. Clearly map the various wetland types and their associated acreages and demonstrate how the Wetland Optimized Alternative would maximize implementable wetland restoration with the establishment of a minimum of 80 acres of additional functional wetlands at the Year 2100, based on current models utilized by the City for sea level rise projections.
- c. Identify any areas of wetland type conversion.

L5-9

4. Eelgrass Designation as a Wetland

The DPEIR incorrectly lists eelgrass beds habitat as wetland habitat (Table 2-3). Eelgrass should be characterized as jurisdictional aquatic resources (Table 2-6) but they are not identified as wetland habitats by any regulatory agency and need to be identified, mitigated, and restored separately from wetlands.

It is not clear in the DPEIR if the eelgrass mitigation sites are included in the acreage calculations for expanded marshland and wetland creation. The DPEIR should include a table that summarizes acreages of each habitat type to be included in the created wetlands and expanded marshland habitat at implementation of the project. Eelgrass mitigation and new open water areas should be calculated separately from wetland creation acreages.

5. Water Quality and Hydrology

The Clean Water Act Section 303(d) list of impaired water bodies identifies Mission Bay at the mouth of Rose Creek as being impaired for eutrophication and lead from upstream sources, and Mission Bay at De Anza Cove is listed as impaired for *Enterococcus*, fecal coliform, and total coliform.

The DPEIR states that "Water quality design features are proposed along the edges of active recreational areas. Proposed water quality detention basins would be of differing sizes and would capture and treat stormwater before flowing into Mission Bay. New water quality detention basins would be located to treat the entire project area in accordance with local and state requirements."

The Draft PEIR should:

- a. Discuss how the project will address 303(d) listed pollutants.
- b. Discuss how the various water quality design features will ensure protection of the existing and created beneficial uses within the project area.

L5-11

The diagram for the Wetland Optimized alternative proposes a cut channel through the boat to De Anza Cove creating a southern island.

L5-9: This comment suggests that the PEIR's characterization of eelgrass beds as a type of wetland habitat is erroneous, requests a table summarizing the acreages of each habitat type to be included in the proposed wetland habitats, and states that eelgrass and open water areas should not be included in wetland creation calculations. Eelgrass beds are classified as a wetland habitat in the PEIR pursuant to the City of San Diego Biology Guidelines (2018) tables 2a and 2b. However, in response to this comment, the wetland creation analysis included in Appendix N focused on calculating the acreages of uplands, salt marsh, and mudflat habitats, rather than subtidal resources such as eelgrass. The Sea Level Rise Assessment Technical Report also includes maps, tables, and figures that contain acreage information for each habitat type in De Anza Natural and the Wetlands Optimized Alternative as requested in this comment.

L5-10: This comment summarizes De Anza Cove's status as an impaired water body and the PEIR's discussion of water quality. The comment then suggests that the PEIR should include additional discussion of how the proposed project would address 303(d) listed pollutants, as well as of how proposed water quality design features will protect uses in the project area.

As discussed in PEIR Section 5.7, Hydrology and Water Quality, the Clean Water Act, Section 303(d), list of water bodies identifies Mission Bay at the mouth of Rose Creek as impaired for eutrophication and lead from upstream sources and Mission Bay at De Anza Cove as impaired for enterococcus, fecal coliform, and total coliform. A significant impact would occur if construction or operation of the project would create new impairments or exacerbate

existing impairments within these waterbodies, which would result in a water quality impact. As stated in Section 5.7 of the PEIR, in accordance with the City's Stormwater Standards Manual, the proposed project is required to incorporate post-construction (or permanent) Low Impact Development site design, source control, and treatment control BMPs into future project design and would require the preparation of a Stormwater Quality Management Plan. The Stormwater Quality Management Plan must accompany the final design of subsequent project activities to ensure that runoff generated by the project is adequately captured/treated per applicable federal, state, and local regulations. Proposed water quality detention basins would be differing sizes and would capture and treat stormwater before flowing into Mission Bay. New water quality detention basins would be located to treat the entire project area in accordance with local and state requirements. Additional water quality-enhancing features would include vegetated areas bordering all development to reduce stormwater contamination, including debris and sediment, from reaching Mission Bay. Revegetating the edges of Rose Creek and along the "boot" of De Anza Cove with marsh, wetland, and upland native plants would create another water quality-enhancing feature. The project would be required to comply with all applicable regulations related to water quality, including those from the Regional Water Quality Control Board.

However, as discussed in PEIR Chapter 3.0: Project Description, no development is currently being proposed. Therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. The CEQA Guidelines contain guidance

on the Tiering process. As stated in CEQA Guidelines Section 15162.c, "Where a lead agency is using the tiering process in connection with an EIR for a large-scale planning approval, such as a general plan or component thereof (e.g., an area plan or community plan), the development of detailed, site-specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of a more limited geographical scale, as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand."

CEQA Guidelines Section 15146 also defines the degree of specificity necessary in an EIR: "The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." An EIR for a project such as the adoption of a Master Plan Amendment should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow. The PEIR does not serve as project-level environmental analysis for any specific development project and adequate information is not available at this time to address potential future site-specific impacts of the proposed project.

The PEIR acknowledges that the City will evaluate future detailed General Development Plans (GDPs) for future projects as they are developed. A GDP, as defined in City Council Policy 600-33, is a Conceptual Master Plan that identifies the activities and amenities to be included in a park. As described in PEIR Section 1.4.1, Type of PEIR, GDPs will be developed over time and will provide precise

engineering and construction plans for the various elements of the project. Since these plans are currently not available at the planning level, their environmental impacts have been estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements. City Council Policy 600-33 outlines the public participation process for the development of future GDPs. A public workshop is required to provide details of the project, including proposed scope, schedule, cost, and related information and would discuss the necessary steps for project review and approval. Once the project design has been finalized and prior to approval, the City will route the project through the Public Project Assessment process, including the preparation of the appropriate environmental documentation in accordance with CEQA. At that time, specific mitigation measures will be developed based on the site-specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. The City also acknowledges that, due to lack of detail and site design in the PEIR, many future projects will undergo site-specific CEQA review, which is the appropriate time to evaluate site-specific impacts. At this point, public and agency comments will be invited to address the site-specific impacts identified in the future CEQA documentation.

Therefore, the discussion and mitigation framework included in the PEIR is adequate for a program-level environmental review of the project in accordance with CEQA Guidelines, Section 15146. No revisions to the PEIR are warranted.

L5-11
cont.

The Draft PEIR should:

- a. Provide a detailed hydrologic analysis to show whether the proposed channel will provide added flushing and water circulation benefits and will not negatively affect the Kendall Frost reserve or impact its beneficial uses.
- b. Provide a detailed discussion of the maintenance requirements this channel will require, as regular dredging and other activities could cause recurring and detrimental impacts to natural resources and water quality in the cove and potentially require additional permitting from the San Diego Water Board.
- c. Provide an analysis of potential sedimentation to the cove from upstream sources and the potential need to dredge the cove.
- d. Provide a hydrologic evaluation of whether a reduction and/or relocation of the island could help improve circulation and access to water for all the areas.
- e. Provide an evaluation of whether the southern island can be used in the future for managed retreat to provide additional wetlands.

Balancing Recreation and Maximized Wetland Creation

The San Diego Water Board understands that the City seeks to find a balance in providing public recreation and the sustainable management of environmental resources. Mission Bay Park is the largest aquatic park of its kind in the country. It consists of over 4,235 acres in roughly equal parts land and water. Mission Bay boasts 27 miles of shoreline, 19 of which are sandy beaches with eight locations designated as official swimming areas. There are almost 14 miles of bike/walking paths along Mission Bay.

L5-12

Mission Bay Park provides free public access and free parking year-round for many uses including picnicking, lawn and water sports, on-water activities like sailing, paddle boarding and kayaking, running, walking, cycling on paths and trails and bird watching. Uses are supported with maintained landscaping and lawns, trash removal, boat docks and launching facilities, restrooms, showers, developed play areas, natural areas, ranger services, and lifeguards.

In balancing the recreational needs, the San Diego Water Board supports maximizing wetland creation opportunities on a scale that includes the entirety of Mission Bay Park. Opportunities for public recreation of all types are abundant throughout Mission Bay Park and the City as a whole, whereas viable opportunities for substantial wetland creation are limited, with the vast majority occurring within the project area.

L5-11: This comment suggests that the PEIR should provide a detailed hydrologic analysis of the proposed channel for the Wetlands Optimized Alternative; a detailed discussion of the maintenance requirements this channel would require; analysis of potential sedimentation; and further hydrologic evaluations.

The design of the future proposed channel is not currently available; therefore, preparation of the analysis requested above would be premature. Please refer to response to comment L5-10, which discusses the degree of specificity necessary in an EIR, and the City's GDP process.

L5-12: This comment discusses the balance of public recreation uses and environmental resources within Mission Bay Park before presenting the San Diego Water Board's view that opportunities for public recreation of all types are abundant throughout Mission Bay Park and the City as a whole, whereas viable opportunities for substantial wetland creation are limited, with the vast majority occurring within the project area. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft PEIR, and no further response is warranted.

L5-13: This comment is conclusory in nature, and no response is required.

L5-13

Thank you for the opportunity to comment on the DPEIR. The San Diego Water Board looks forward to working alongside the City of San Diego to restore vital wetlands to Mission Bay. If you need clarification or wish to discuss these comments, please contact Christopher Means at christopher.means@waterboards.ca.gov.

Respectfully,

**Kelly
Dorsey** Digitally signed
by Kelly Dorsey
Date: 2023.05.03
11:17:25 -07'00'

KELLY DORSEY, P.G.
Assistant Executive Officer

cc:

Chiara Clemente, San Diego Water Board, Chiara.Clements@waterboards.ca.gov
Jeremy Haas, San Diego Water Board, Jeremy.Haas@waterboards.ca.gov
Keli Balo, City of San Diego, Kbalo@sandiego.gov
Andrew Meyer, ReWild Coalition, meyer@audubon.org

Comment Letter O1: Save Our Access, March 31, 2023

O1

From: Sandel, Scott
To: Moore, Jordan
Subject: FW: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan
Date: Monday, April 3, 2023 8:28:14 AM

EIR comments

Scott Sandel

619.235.5204
 ssandel@sandiego.gov

From: Scott <scott300@earthlink.net>
Sent: Friday, March 31, 2023 12:06 PM
To: Sandel, Scott <SSandel@sandiego.gov>
Cc: Andrew Meyer <meyer@sandiegoaudubon.org>; John McNab <johnamcnab@yahoo.com>; David Kennedy DDS <davidkennedydds@gmail.com>; Cameron Havlik <cameron.j.havlik@gmail.com>
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan

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Hello Scott,

Save Our Access (SOA) is a 501 C3 non profit that addresses coastal access issues, including habitat mitigation and water quality of recreational waters.

O1-1

Please find below our initial draft EIR comments as a member of Audubon ReWild Mission Bay's coalition in support of our Wildest alternative for wetland habitat restoration.

City of San Diego, RWQCB Failure to Address Bay Water Quality
 Soon after the city took over Mission Bay State Park in 1950, it ignored Bay recreation and environment by dredging over 98% of Bay wetland habitat -
 -- The City of San Diego then over-privatized the bay with six resort hotels, SeaWorld, Campland, and the De Anza Point mobile home park – illegal 60-year permanent private housing double wides on public tidelands that demands mitigation.
 -- The City installed in park east bay: South Shores garbage dump, a WWII So. Shores

O1-2

O1-1: This comment provides an introduction to the comment letter and provides information regarding Save Our Access, including its support for the “Wildest” alternative for wetland habitat restoration. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

O1-2: This comment states that the City of San Diego (City) has ignored bay recreation and the environment over the past 50+ years and mentions various examples of locations outside the project area. As discussed in PEIR Chapter 3.0, Project Description, the project is an Amendment to the Mission Bay Park Master Plan to update existing language in the plan and to add new language and recommendations pertaining to the project area to serve local and regional recreation needs while preserving and enhancing the natural resources of the De Anza Cove area. The project would expand the project area’s natural habitat and improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect the City against the risk of climate change in line with the City’s Climate Resilient SD Plan. The project is not responsible for mitigating conditions outside the project area that are unrelated to its implementation. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O1-2 cont. wetland-taking, leaking toxic military/industrial waste dump, a sewage treatment pond facility on Fiesta Island, and allowed total erosion of East Ski Island.
 -- Also requiring mitigation, instead of ever adding wetlands to filter bay pollution, the City approved Dana Inn hotel lease expansion that bulldozed Sunset Point Park, twice promoted a public-blocked expansion of the Bahia Resort Hotel endangering Bahia Point Park, and twice expanded SeaWorld's vast leasehold.
 -- Neither same-lessee Campland or DeAnza provided low cost park overnight lodging.

O1-3 **East Mission Bay's Toxic Soup Impacts – MBMaster Plan re De Anza Point:**
 “Foremost, the area shall be used to improve bay water quality.”
 1.) Project lead agent City of San Diego and the RWQCB are the responsible parties to finally clean up Mission Bay's TMDL status as a Clean Water Act Section 303 (d) “impaired water body” for coliform and heavy metals. The two parties have yet to demonstrate a plan or progress to disimpair a recreational water body visited by over 12 million residents and tourists yearly.
 2.) Project site east Mission Bay is a stagnant water body subject to non point source [NPS] urban runoff from fully three urban watersheds. Just the Rose Creek Watershed dumps storm incident urban runoff in river volumes into the bay.
 3.) East Mission Bay hosts the unlined, unremediated So. Shores “Mission Bay Landfill”, a toxic military industrial waste dump EPA-scored equal to the Stringfellow Acid Pits and which continues to leak into east Bay and San Diego River.
 4.) East Mission Bay is immune to the strong Pacific Ocean tidal flushing action that west Bay enjoys.
 San Diego State University hydrologist Dr. Richard Gersberg finds that the only way to ever disimpair east Mission Bay is to provide the scale of passive filtration by wetland plants adequate to the Bay's extreme pollutant loading:
 – Increased contamination looms from new mandated watersheds' infill development.
 – Decreased wetlands due to sea level rise will further degrade east Bay water quality.
 – Even if clean water were pumped in, benefit would be overwhelmed by runoff flows.

O1-4

O1-5

O1-6 – Wildlife impacts: Low king tides reveal wholesale Bay invertebrate depletion, and viable nesting sites of foraging endangered bird species has declined from 11 to 3.

O1-3: This comment states that the City and the Regional Water Quality Control Board are the responsible parties to clean up Mission Bay. As discussed in PEIR Section 5.7, Hydrology and Water Quality, the Clean Water Act, Section 303(d), list of water bodies identifies Mission Bay at the mouth of Rose Creek as impaired for eutrophication and lead from upstream sources and Mission Bay at De Anza Cove as impaired for enterococcus, fecal coliform, and total coliform. A significant impact would occur if construction or operation of the project would create new impairments or exacerbate existing impairments within these waterbodies, which would result in a water quality impact. Water quality design features are proposed along the edges of active recreational areas. Proposed water quality detention basins would be differing sizes and would capture and treat stormwater before flowing into Mission Bay. New water quality detention basins would be located to treat the entire project area in accordance with local and state requirements. Additional water quality-enhancing features would include vegetated areas bordering all development to reduce stormwater contamination, including debris and sediment, from reaching Mission Bay. Revegetating the edges of Rose Creek and along the “boot” of De Anza Cove with marsh, wetland, and upland native plants would create another water quality-enhancing feature. The project would be required to comply with all applicable regulations related to water quality, including those from the Regional Water Quality Control Board.

As discussed in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. As described in PEIR Section 1.4.1, Type of PEIR, General Development Plans will be developed over time that provide precise engineering and

construction plans for the recreational elements of the project. Since these plans are currently not available at the planning level, their environmental impacts have been estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements. Water quality impacts resulting from the project are adequately addressed in the PEIR as required by CEQA. No revisions to the PEIR are warranted.

O1-4: This comment states that East Mission Bay hosts the unlined, unremediated South Shores “Mission Bay Landfill,” a toxic military industrial waste dump that continues to leak into East Mission Bay and the San Diego River. South Shores is not within the project area, as shown on PEIR Figure 3.1, Site Plan. As discussed in PEIR Section 5.5, Hazards and Hazardous Materials, a Phase I Environmental Site Assessment (ESA) was conducted for the project and included a review of historical source information, a search of regulatory agency databases within specified distances of the subject property, a review of available local agency records, interviews, and a site reconnaissance. Based on the environmental database search completed for the project-specific Phase I ESA, three underground storage tanks were removed from the Campland on the Bay (Campland) area in 1986. The PEIR concluded that encountering soil contamination during grading and excavation could result in potentially significant hazards and hazardous materials impacts to on-site construction personnel. In addition, placement of these contaminated soils for use as fill in other areas of the project area could result in cross-contamination of existing clean areas. It is anticipated that earthen material would be moved from the Campland area during grading and demolition and used as fill in other areas of De Anza Cove. The PEIR concluded that implementation of Mitigation Measures MM

HAZ 5.5-1 through MM HAZ 5.5-4 would ensure that transformers are removed and properly disposed of per regulatory requirements, soil testing occurs prior to construction, procedures are in place for the management of potentially impacted soil, and chemicals have been properly stored and disposed of in accordance with applicable local, state, and federal guidelines and/or regulations.

O1-5: This comment states that East Mission Bay is immune to the strong Pacific Ocean tidal flushing action and that the only adequate way to address the bay's extreme pollutant loading is through passive filtration by wetland plants. Please refer to response to comment O1-2 regarding wetland restoration and response to comment O1-3 regarding water quality.

O1-6: This comment states that viable nesting sites of foraging endangered bird species has declined and that Mission Bay's ecology has been ignored to expand commercial lessees. The project would expand habitat areas, resulting in long-term benefits to wetland habitat, species, and the functions and values of the aquatic resources. In addition, PEIR Section 5.3.3.1, Issue 1: Sensitive Species, states that potential impacts related to sensitive species, including endangered bird species, could result from implementation of the project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O1-6
cont.

The City has long ignored the Bay's ecology to expand commercial lessees. In rejecting all three of Audubon ReWild's finding alternatives, the City denies the extensive wetland restoration required.

O1-7

The City EIR completely ignores Bay impairment and mitigation. Legal action or resource reversion to the State that funded ReWild's Wildest findings may be required.

Scott Andrews
Save Our Access
619 221-5947

O1-7: This comment states that, in rejecting all three of San Diego Audubon Society's ReWild alternatives, the City denies the extensive wetland restoration required. Please refer to response to comment F1-5, which provides a discussion regarding the reasonable range of alternatives evaluated in the PEIR and the project's consistency with the environmental goals of the Mission Bay Park Master Plan. The project would include enhancement and restoration within the existing Kendall-Frost Marsh Reserve/Northern Wildlife Preserve, expansion of wetlands currently occupied by Campland, and expanded marshland and habitat in the Rose Creek and De Anza Cove areas for a total of approximately 225.1 acres. In addition, the project includes the analysis of the Wetland Optimized Alternative, which would provide approximately 250.9 acres of expanded marshland habitat. No revisions to the PEIR are warranted.

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Comment Letter O2: Pacific Youth Soccer League, April 12, 2023

O2

From: [Joseph Smith](#)
To: [PLH_PlanningCEQA](#)
Cc: [Justin Weber](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan PEIR
Date: Wednesday, April 12, 2023 10:50:28 AM
Attachments: [PYSL Program EIR Comment Letter - De Anza Draft EIR \(4.12.23\).pdf](#)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Jordan,

Attached is a comment letter on the De Anza Draft Program EIR from Pacific Youth Soccer League (PYSL). For over 50 years, PYSL has provided organized youth soccer to the community and serves many families regardless of income level. In 2023, we expect to enroll nearly 1,600 kids in recreational and competitive youth soccer programs and rely upon the Bob McEvoy fields annually. As described in our comments, we believe the Draft Program EIR must include additional analysis and clarification related to impacted active recreation space in the proposed Mission Bay Park Master Plan amendment.

On behalf of the entire PYSL Board of Directors, to which I also serve in a volunteer capacity, we request the City consider our comments during its environmental review process and ensure that a reasonable range of alternatives be studied prior to Council's consideration of the plan amendment.

Please confirm receipt of this letter and add my contact to any interested parties list you may have.

Much appreciated,
Joe

Joseph D. Smith, AICP | Principal
California Coastal Works
(619) 943-1337 | jsmith@californiacw.com
www.californiacoastalworks.com

O2-1: This comment provides an introduction to the comment letter, states some background information on the Pacific Youth Soccer League (PYSL), and requests the City of San Diego (City) ensure that a reasonable range of alternatives be studied. The City appreciates the PYSL's participation in the review of the Draft Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR for the project identifies a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. Chapter 8.0 evaluates four alternatives that were selected for additional analysis. In addition, Chapter 8.0 identifies the ReWild Mission Bay "Wild," "Wilder," and "Wildest" alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative that were considered but rejected for their failure to meet the project objectives. The rationale for eliminating each alternative is provided in Chapter 8.0. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O2-1



April 12, 2023

Jordan Moore, Senior Environmental Planner
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123

RE: Comment Letter for De Anza Natural Draft Program Environmental Impact Report (SCH #2018061024)

O2-2

Founded in 1971, Pacific Youth Soccer League (“PYSL”) is a nonprofit organization that has based its programs in Mission Bay’s De Anza Cove for over 50 years. PYSL is dedicated to the positive development of San Diego’s youth through recreational and competitive soccer programs. PYSL serves the immediate communities of Clairemont, Bay Park, and Pacific Beach, in addition to La Jolla, Mission Valley, University City, Downtown and Mission Hills. We currently organize over 150 teams annually with over 1,600 players between our programs and continue to see greater demand year after year. Due to committed families and a dedicated Board, we remain a nearly all-volunteer league that maintains lower registration fees and offers scholarships for families needing assistance. Soccer is a universal sport shared across gender, ethnicity and race, regardless of income levels, and we are proud to have called Mission Bay home for so many decades. However, our programs are under threat by the current version of the proposed De Anza Natural amendment to the Mission Bay Park Master Plan (“MBPMP”).

O2-3

Per the proposed De Anza Natural amendment (“Proposed Project”) and all Alternatives described in the Draft Program Environmental Impact Report (“Draft PEIR”) therewith, there is no guarantee that active field space to support organized youth soccer will remain in De Anza Cove – fields that PYSL have relied upon for several decades located at 2701 Grand Avenue. In fact, we continue to honor Bob McEvoy who was instrumental in getting the field dedicated for local youth sports and lights for the fields that now bear his name. McEvoy Youth Field

O2-2: This comment summarizes the background and mission of the PYSL. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O2-3: This comment states that there is no guarantee that active field space to support organized youth soccer will remain in De Anza Cove. In response to this comment and others, PEIR Figure 3-1, Site Plan, and PEIR Table 3-2, Proposed Land Use Acreages, in PEIR Chapter 3.0, Project Description, have been revised in the Final PEIR to ensure no net loss of active recreation use acreage compared to the existing condition. In addition, the City will strive to design and phase development of future facilities in a manner that minimizes disruption to active recreation access. Any necessary buffer zones and other land uses proposed on existing recreation facilities would be implemented after these facilities have been modified, moved, or replaced for continued use, unless imminent climate hazards necessitate more immediate mitigation. There is no plan to reduce the active recreation acreage occupied by the PYSL, although the current footprint may be shifted over time. At this time, no development is proposed, and no design is available. Thus, the evaluation of potential future changes is speculative. The PEIR acknowledges that the City will evaluate future detailed General Development Plans (GDPs) for future projects as they are developed. A GDP, as defined in City Council Policy 600-33, is a Conceptual Master Plan that identifies the activities and amenities to be included in a park. As described in PEIR Section 1.4.1, Type of PEIR, GDPs will be

is PYSL's primary location for recreational soccer programs where all of our soccer games for children under 9 years old are played. The attached exhibit shows PYSL's use of Bob McEvoy Field comprised of six youth fields ranging in size from 30 x 20 yards (for ages 6 and under) to 65 x 45 yards (for ages 9 and under).

O2-3
cont.

It is for this reason the PYSL Board of Directors must share its comments on the City's proposal and recognize two efforts are underway: 1) a proposed amendment to the MBPMP titled De Anza Natural; and 2) a Draft PEIR to study the potential impacts associated with the proposed amendment. On behalf of the entire PYSL Board of Directors, this letter serves as our formal comments to the Draft PEIR currently in circulation for public review. We will send our comments on the proposed amendment under separate cover.

O2-4

The demand for youth soccer continues to increase and has since the De Anza Natural process began over four years ago. Per our registration records, in 2019 PYSL served approximately 1,400 players comprised of 400 in our spring recreational league, 700 in our fall recreational league, and 300 competitive players as part of our Blast program. This year, we are on target to serve over 1,600 players comprised of approximately 470 in our spring recreational league, 750 anticipated for our fall recreational league, and 400 competitive players now registered in our 2023 Blast program. This is not the time to adopt changes to the MBPMP that would reduce active recreational field space for youth sports – sports that cater to families of varying incomes and ethnicity. This is the time to reinforce active, healthy lifestyles for children and access to youth sports attainable for all of San Diego's families.

O2-5

The existing Active Recreation acreage is 62.6 acres (ac) per De Anza Natural Figure 2-3. This is comprised of "Mission Bay Tennis Center, Athletic Fields and Golf Course" per the figure. Per De Anza Natural Figure 3, the Proposed Project would remove 2.5 ac of Active Recreation area and reduce the total Active Recreation to 60.1 ac. The reduction includes a direct land use change from "Active Recreation" to "Uplands and Buffers" for a linear portion of the Bob McEvoy Field east of Rose Creek – a space actively used by organized youth sports including PYSL soccer programs.

De Anza Natural Figure 16b identifies the space referred to as Bob McEvoy Field as "Existing Dedicated Athletic Fields" which runs adjacent to Rose Creek and has

developed over time and will provide precise engineering and construction plans for the various elements of the project. Since these plans are currently not available at the planning level, their environmental impacts have been estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements. City Council Policy 600-33 also outlines the public participation process for the development of future GDPs. A public workshop is required to provide details of the project, including proposed scope, schedule, cost, and related information, and would discuss the necessary steps for project review and approval. Once the project design has been finalized and prior to approval, the City will route the project through the Public Project Assessment process, including the preparation of the appropriate environmental documentation in accordance with CEQA. At that time, specific mitigation measures will be developed based on the site-specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. The City also acknowledges that, due to the lack of detail and site design in the PEIR, many future projects will undergo site-specific CEQA review, which is the appropriate time to evaluate site-specific impacts. Therefore, the project is adequately analyzed in the PEIR, and no revisions to the PEIR are warranted.

O2-4: This comment provides a summary of the PYSL and the number of participants. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

O2-5: This comment states that the PEIR does not sufficiently disclose the conversion of "dedicated" active recreational

O2-5
cont.

for many years. The Draft PEIR does not sufficiently disclose or explain the conversion of “dedicated” Active Recreational field area (or “Play Fields” as also referred to in De Anza Natural) to a non-recreational use (i.e., Upland Habitat). Further, the Draft PEIR does not disclose or explain what actions would be necessary on the part of the City to divest itself of any dedications intended to maintain youth sports fields at this location. The Draft PEIR must provide this information in a clear and transparent manner, including background on “existing dedicated athletic fields,” intent of said dedicated fields, proposed actions associated with the Proposed Project and said dedications, and sufficient analysis and mitigation to compensate for the loss of field space and impacts on other facilities associated with the relocation of youth sports.

Existing MBPMP Figure 14 (Recommendation 30) is clear that locations for recreational facilities for use by organized sports in Mission Bay are allowed, but extremely limited. The Recommendation reads “Given its unique water setting, Mission Bay Park should not be targeted as a location for organized soccer or other league play beyond the existing facilities in Robb Field and Pacific Beach Playing Fields.” This is how the MBPMP currently reads. Note that Bob McEvoy Field is the “Pacific Beach Playing Field” referenced in the Recommendation.

O2-6

The Proposed Project and all Alternatives considered in the Draft PEIR reduce the size of Active Recreation space from Existing Conditions, fields currently used by thousands of children at the Pacific Beach Playing Fields (i.e., Bob McEvoy Field) – one of two locations deemed acceptable for organized youth sports in all of Mission Bay. However, the Draft PEIR does not disclose the impacts to existing recreational facilities, yet impacts are reasonably foreseeable based on the proposed location of Uplands and Buffers in the Pacific Beach Playing Fields. Further, the Draft PEIR does not mitigate the direct impacts to other recreational facilities and/or new recreational facilities needed outside of the Mission Bay Park. In lieu, the Draft PEIR concludes that options for joint use of the Mission Bay High School’s athletic fields could be considered.

One of the reasons PYSL can maintain low registration fees and offer youth soccer to families of all income ranges is because of reasonable permit fees charged by the City for use of Bob McEvoy Field. The conclusion that youth sports could simply relocate to Mission Bay High School assumes this is a feasible option yet is not supported by any analysis in the Draft PEIR. Further, the Draft PEIR does not

field area (or “playing fields” as referred to in the PEIR) to a non-recreational use (i.e., upland habitat). Further, the comment states that the PEIR does not disclose or explain what actions would be necessary on the City’s part to divest itself of any dedications intended to maintain youth sports fields at this location. Please refer to response to comment O2-3, which states that the project’s active recreation acreage has been revised so there is no net loss, including the active recreation acreage occupied by the PYSL.

O2-6: This comments states that the PEIR does not disclose the impacts associated with a reduction in acreage of active recreational facilities and does not mitigate the direct impact to other recreational facilities and/or new recreational facilities needed outside Mission Bay Park. In addition, this comment states that the PEIR assumption that youth sports could relocate to Mission Bay High School is not supported by additional analysis and that the PEIR does not provide analysis of other locations or the impact on such facilities. Please refer to response to comment O2-3. The Final PEIR has been revised to ensure no net loss of active recreation use acreage compared to the existing condition, including the acreage occupied by the PYSL.

O2-6
cont.

provide any analysis of other locations for youth sports to relocate to, nor the impact on such facilities. The reality is that use of Mission Bay High School's facilities as the offset to the Proposed Project's reduction in Active Recreation would increase costs for San Diego's families desiring to play soccer with PYSL. This is because use of Mission Bay High School's facilities are considerably more expensive than use of the City's field at Bob McEvoy. Further, Mission Bay High School has a robust sports program and actively uses its facilities for its students and school sports. This analysis is not provided in the Draft PEIR or disclosed. As PYSL is a nonprofit organization, we do not carry large profit margins and intentionally keep our registration costs low. However, if forced to relocate programming to Mission Bay High School, registration costs would need to increase, and it is unknown what capacity San Diego Unified School District / Mission Bay High School has for organized youth sports. This means barriers to access for some families and less opportunities for use of Mission Bay for organized sports.

O2-7

Because the Draft PEIR does not sufficiently describe or analyze this, it is unclear how the Proposed Project and all of the Alternatives promotes the first Project Objective to "Provide equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access." Active Recreation is not Regional Parkland, yet the MBPMP considers Active Recreation an important (yet limited) use in Mission Bay. The Draft PEIR appears to consider "access" as one in the same. Yet it is not. Trading Active Recreation acreage for Regional Parkland acreage decreases equitable access to De Anza Cove for organized sports and will create barriers to access for some San Diego families as a result.

O2-8

The reduction in Active Recreation space would directly impact the westerly space at Bob McEvoy Field dedicated for youth sports. Per the attached exhibit, PYSL currently uses this area to facilitate four of six youth soccer fields. As a result, the Proposed Project results in a direct impact on recreation and recreational facilities; however, this is not disclosed in the Draft PEIR, nor is there an environmental topic specific to Recreation described in the Draft PEIR. The Draft PEIR must address Recreation head-on, explain the Existing Framework associated with recreation in De Anza Cove, the background on dedicated sports fields at De Anza, and analyze the Proposed Project and Alternatives' impacts. It is evident that the number of youths participating in outdoor sports is not declining but

O2-7: This comment states that it is unclear how the project and alternatives promote the first project objective. As described in Chapter 3.0, Project Description, the project would enhance the existing parkland by providing a variety of uses, including active and passive recreational opportunities, to enhance public use of the area and improvements to access to recreational uses. Please refer to response to comment O2-3. The Final PEIR has been revised to ensure no net loss of active recreation use acreage compared to the existing condition.

O2-8: This comment states that the reduction in active recreation space would directly impact the westerly space at the Bob McEvoy Field Complex dedicated for youth sports. Please refer to response to comment O2-3. In response to this comment and others, PEIR Figure 3-1, Site Plan, and PEIR Table 3-2, Proposed Land Use Acreages, in PEIR Chapter 3.0, Project Description, have been revised in the Final PEIR so there would be no net loss of active recreation acreage, including the active recreation acreage occupied by the PYSL. Any necessary buffer zones and other land uses proposed on existing recreation facilities would be implemented after these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. There is no plan to reduce the active recreation acreage occupied by the PYSL, although the current footprint may be shifted over time. At this time, no development is proposed, and no design is available; thus, the evaluation of potential future changes is speculative. Please refer to response to comment O2-3 regarding the GDP process.

continues to increase year after year. Since 2019, PYSL's annual registration was 1,400 players and we are on track to serve over 1,600 players in 2023. The Draft PEIR insufficiently describes realistic facts associated with organized youth sports to be impacted by the Proposed Project and all Alternatives considered.

O2-8
cont.

The reduction in active recreation acreage is not sufficiently identified in the Draft PEIR narrative but requires a reader to interpret various figures provided in the Proposed Project. This is difficult to understand and can be confusing to the public. The Draft PEIR must provide this information also in narrative and in a clear and transparent manner (i.e., the reduction in active recreation acreage and the reasons why) for the Proposed Project and all Alternatives considered in the Draft PEIR.

O2-9

The Environmentally Superior Alternative (Alternative 1) is named "Enhanced Wetlands/Optimized Parkland" and implies some type of balance between climate resiliency and improve park space; however, this is an improper and misleading title as the Alternative results in a greater reduction of Active Recreation space from 62.6 ac (Existing Conditions) to 52.6 ac (Alternative), a loss in 10 acres. While the Alternative does increase Regional Parkland and Wetland space, the reduction in Active Recreation is not sufficiently disclosed in the project description and analysis, including land use consistency analysis with the Recreation Element. Further, this Alternative does not sufficiently explain how a 10-acre reduction in Active Recreation (compared to Existing Condition) or a 7.5-acre reduction in Active Recreation (compared to the Proposed Project) "Optimizes Parkland" as noted in the title of the Alternative. Based on the proposed acreage summary, it is clear that Active Recreation is being traded with increases in Regional Parkland and Wetlands in order to provide "Enhanced Wetlands" and "Optimized Parkland" yet this is not sufficiently described in the Draft PEIR and is confusing to the public.

O2-10

The Draft PEIR land use consistency analysis (PEIR, Appendix B) concludes the Proposed Project is "Consistent" with Recreation Element Goal A and Policy RE-A.3 regarding equitable access to parks and recreation facilities. Further, the consistency statement states that "The project would also retain existing active recreational uses north of the project area." For the reasons described herein, the Draft PEIR's conclusion of Consistency has not been sufficiently supported by facts or appropriate analysis.

O2-9: This comments states that the Enhanced Wetlands/Optimized Parkland Alternative is a misleading title because the alternative results in a greater reduction of active recreation and that the reduction is not sufficiently disclosed. As described in PEIR Chapter 8.0, compared to the project, the Enhanced Wetlands/Optimized Parkland Alternative would create additional acreage of wetlands and regional parkland while reducing the amount of upland habitat, low-cost visitor guest accommodations, and active recreation. PEIR Table 8-4, Comparison of Enhanced Wetlands/Optimized Parkland Alternative to the Proposed Project, provides a comparison of the alternative's land uses compared to the land uses in the project. As noted in PEIR Section 8.3.3.3, Relationship to Project Objectives, this alternative would not fully implement project objectives 1 and 5 because it would not fully provide equitable access to De Anza Cove or fully diversify active and passive recreational uses because this alternative would reduce the amount of low-cost guest visitor accommodations, open beach, and active recreation opportunities compared to the project.

O2-10: This comment states that the project's land use consistency analysis with Recreation Element Goal A and Policy RE-A.3 in the PEIR has not been sufficiently supported by facts or appropriate analysis. As discussed in PEIR Section 5.1, Land Use, PEIR Appendix B, Land Use Consistency Tables, includes a discussion of the project's compliance with relevant goals and policies of the City's General Plan. PEIR Appendix B discusses the project's consistency with Policy RE-A.3, which states, "Take advantage of recreational opportunities presented by the natural environment, in particular beach/ocean access and open space." As mentioned, the project would enhance recreational amenities in the project area through the

construction of multi-use pathways with designated viewing areas and overlooks. The project would also include natural recreation areas and expanded regional parkland. Additional amenities would include a sandy beach area, boat facilities, low-cost visitor guest accommodations, surface parking, and associated open space and camping facilities, such as picnic shelters and restrooms. The project would also retain existing active recreational uses north of the project area. Please refer to response to comment O2-3, which states that the Final PEIR has been revised so there would be no net loss of active recreation acreage. No revisions to the land use consistency analysis in the PEIR are warranted.

O2-11 The Draft PEIR fails to specifically describe impacts to Recreation as a separate environmental topic. It is evident based on comments in the record that Recreation be warranted a separate consideration of environmental analysis and impacts consistent with CEQA Guidelines (notwithstanding the City's supplemental CEQA Guidelines as they may exist). By avoiding a specific section on Recreation, the PEIR is missing a critical area of controversy and concern raised repeatedly by members of the public gravely concerned with the loss of Active Recreation due to De Anza Natural's project description.

O2-12 It is an incorrect statement as the project area "would also retain existing active recreational uses north of the project area." This is not true because the Proposed Project proposes to reduce the Active Recreation acreage and provides no guarantee that active recreation uses (existing baseline) will continue to be maintained in the Proposed Project. Also note that this statement describes the existing active recreational uses are north of the project area when in fact they are directly in the project area. These issues must be addressed in the Draft PEIR and the location of existing active recreational uses must be corrected.

O2-13 The Proposed Project reduces the active recreational acreage from 62.6 ac to 60.1 ac (or further to 52.6 ac if the Environmentally Superior Alternative is ultimately selected). This must be sufficiently disclosed and explained in the Draft PEIR.

O2-14 The Proposed Project provides no guarantee that the "existing active recreational uses" will be retained. Instead, when describing future "active recreation," the PEIR explains that "the combination and layout of recreation and athletic facilities would be designed during the General Development Plan (GDP) process and at the time of redevelopment and implementation of project enhancements, and one or more GDPs could cover different areas in the project area." Contrary to the conclusion in RE-A.3, this is not a guarantee that existing active recreational uses will be retained. Note that the response to comments received during the NOP process regarding active recreational concerns reference the reader to see the response to RE-A.3. As described above, the PEIR's response to RE-A.3 is not sufficient. Further, the bulk of the RE-A.3 response generally focuses on "enhancing recreational amenities...through the construction of multi-use pathways with designated viewing areas and overlooks...[construct] a sandy beach area, boat facilities, low-cost visitor guest accommodations, surface

O2-11: This comment states that the PEIR fails to specifically describe impacts to recreation as a separate environmental topic. Please refer to responses to comments O2-3 and O2-6. The Final PEIR has been revised to ensure no net loss of active recreation use acreage compared to the existing condition, including the acreage occupied by the PYSL. Furthermore, as discussed in CEQA Guidelines Appendix G, a project could have a significant effect on the environment with respect to Recreation if the following occurs:

XVI. RECREATION.

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

As discussed in Chapter 7: Other Mandatory Discussion Areas of the PEIR, the project would include natural areas; low-cost visitor guest accommodations; lease areas; regional parkland; and recreation areas, but implementation of the project would not result in the construction of housing and the project would not introduce additional residents to the area. The project would not introduce new housing or residents that would increase the use of existing recreational facilities or require the construction or expansion of recreational facilities. Therefore, the project does not have the potential to result in Recreation-related impacts as defined by CEQA, and

revisions to the PEIR to discuss Recreation as a separate impact area are not warranted.

- O2-12:** This comment claims that the PEIR incorrectly states that the project would retain existing active recreational uses north of the project area. As discussed in Chapter 3.0, Project Description, and shown on PEIR Figure 3-1, Site Plan, the northern area of the project area currently contains active recreational facilities. Any facilities located outside the boundaries identified on PEIR Figure 3-1 are not part of the project. Please refer to response to comment O2-3, which states that the Final PEIR has been revised so there would be no net loss of active recreation acreage.
- O2-13:** This comment states that the project reduces the active recreational acreage from 62.6 acres to 60.1 acres, which is not disclosed in the PEIR. PEIR Table 3-1, Existing Land Use Acreages, identifies existing land uses and associated acreages and identifies 62.6 acres for Mission Bay Tennis Center, Athletic Fields, and Golf Course. Proposed land uses for the project area are summarized in PEIR Table 3-2, Proposed Land Use Acreages, including active recreation. Please refer to response to comment O2-3, which states that the project's active recreation acreage has been revised so there is no net loss.
- O2-14:** This comment states that the PEIR provides no guarantee that the "existing active recreational uses" will be retained. Please refer to response to comment O2-3.
- O2-15:** This comment states the response regarding RE-A.3 is not sufficient. Please refer to response to comment O2-10.

O2-15
cont. | parking, and associated open space and camping facilities, such as picnic shelters and restrooms.” These components are not active recreation as defined in the Mission Bay Park Master Plan. These issues must be sufficiently disclosed and explained in the Draft PEIR.

O2-16 | The Proposed Project extends the City’s “lease area” west and into the existing dedicated playing fields (see De Anza Figure 11); however, does not sufficiently describe the associated (future) actions to result in new lease areas or the potential impacts associated with new lease areas of existing, non-leased land in Mission Bay Park (and in particular, Bob McEvoy Field). This must be disclosed, explained and sufficiently analyzed.

O2-17 | The following environmental considerations must also be addressed in the PEIR for the Proposed Project:
▪ Analyze the inclusion of development requirements that guarantee a minimum of 62.6 ac of active recreation must provided in the De Anza Natural Development Criteria and reflected in the Proposed Project description.

O2-18 | ▪ Revise the consistency finding associated with RE-A.3 to a level of insignificance with mitigation, and include a mitigation measure requiring the De Anza Natural Development Criteria provide a minimum of 62.6 ac of active recreation in order to ensure that active recreation uses in the project area remain.
▪ Revise the consistency finding associated with RE-A.3 to a level of insignificance with mitigation, and include a mitigation measure requiring any future General Development Plan (GDP) include a minimum of six youth-sized soccer fields ranging in size from 30 x 20 yards to 65 x 45 yards (reference the attached exhibit).

O2-19 | ▪ Revise the title of Alternative 1 (Enhanced Wetlands/Optimized Parkland) to clearly describe the Alternative’s intentions (e.g., Enhanced Wetlands/Increased Regional Parklands/Decreased Active Recreation) to avoid misleading the public. As written and with insufficient narrative or analysis, Alternative 1 is misleading to the public as it further reduces active recreation area from existing conditions by 10 acres and the Proposed Project by 7.5

O2-16: The comment states that the project extends the City’s “lease area” west and into the existing dedicated playing fields as shown on Amendment Figure 11. Please refer to response to comment O2-3. No further revisions to the PEIR are warranted.

O2-17: This comment states that the PEIR should analyze the inclusion of development requirements that guarantee a minimum of 62.6 acre of active recreation. Please refer to response to comment O2-3. PEIR Figure 3-1, Site Plan, and Table 3-2, Proposed Land Use Acreages, in PEIR Chapter 3.0, Project Description, have been revised in the Final PEIR so there would be no net loss of active recreation acreage, including the active recreation acreage occupied by the PYSL. No further revisions to the PEIR are warranted.

O2-18: This comment states that the consistency finding associated with Policy RE-A.3 should be revised to include a mitigation measure requiring 62.6 acres of active recreation and include specific field sizes. Please refer to responses to comments O2-3 and O2-13. No further revisions to the PEIR are warranted.

O2-19: This comment states that the title of Alternative 1 (Enhanced Wetlands/Optimized Parkland Alternative) should be revised to clearly describe the alternative’s intentions (e.g., Enhanced Wetlands/Increased Regional Parklands/Decreased Active Recreation Alternative) to avoid misleading the public. Please refer to response to comment O2-9. No revisions to the PEIR are warranted.

O2-19
cont.

acres. While the Alternative proposed to increase Regional Parkland, it decreases Active Recreation and impacts access to the bay.

O2-20

▪ The Alternatives provided in the Draft EIR appear to be one in the same spirit and do not provide a range of alternatives intended to feasibly attain most of the basic objectives of the Proposed Project. In fact, of the six Project Objectives listed in Section S.2, only two of the six are specific to climate adaptation, resiliency, and natural habitats within De Anza Cove. The other four Objectives extend broadly beyond those objectives. However, in reading the Alternatives as described, it appears that the motivation for the Alternatives and the Proposed Project share a common theme of climate resiliency, water quality, and habitat creation. This is not a reasonable range of alternatives. If, for example, the Project Objectives were centrally focused on water quality, habitat and climate change adaptation, then the alternatives provided in the Draft EIR appear to feasibly attain most of the Project Objectives. The objectives include more than addressing water quality, habitat and climate change adaptation (see for example Objectives 1, 2, 5 and 6). Note that in every objective, Active Recreation is reduced considerably yet this reduction is contrary to some of the Project Objectives (e.g., 1 and 5), while wetlands, uplands and buffers are enhanced.

O2-21

▪ Include a replacement alternative or fourth alternative that emphasizes retaining or increasing the current Active Recreation area from existing conditions (promotes Project Objectives 1 and 5 in particular), while still leaving sufficient area for other priority uses including wetland, boat facilities, and low-cost accommodation (promotes Objectives 2, 3, 4 and 6).

O2-22

▪ Provide a specific Recreation environmental topic section in the PEIR consistent with Appendix G of the CEQA Guidelines. Given the extent of areas of concern raised in this correspondence and other correspondence and public comment provided during the NOP scoping phase, it is evident that Recreation be warranted a separate consideration of environmental analysis and impacts consistent with CEQA Guidelines (notwithstanding the City's supplemental CEQA Guidelines as they may exist). By avoiding a specific section on Recreation, the PEIR is missing a critical area of controversy and concern raised repeatedly by members of the public gravely concerned with the loss of Active Recreation due to De Anza Natural's project description.

O2-20: This comment states that the alternatives provided in the EIR appear to be one and the same in spirit and do not provide a range of alternatives intended to feasibly attain most of the basic objectives of the project. The PEIR identifies a reasonable range of alternatives pursuant to CEQA Guidelines, Section 15126.6. PEIR Chapter 8.0, Alternatives, evaluates four alternatives that would reduce impacts compared to the project (No Project/No Build Alternative, Wetlands Optimized Alternative, Enhanced Wetlands/Optimized Parkland Alternative, and Resiliency Optimized Alternative). The PEIR goes above the requirements of CEQA by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b). No revisions to the PEIR are warranted.

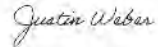
O2-21: This comment requests the addition of a replacement alternative or fourth alternative that emphasizes retaining or increasing the current active recreation area from existing conditions. Please refer to response to comment O2-3, which states that the project's active recreation acreage has been revised so the project would result in no net loss of active recreation. This comment is no longer applicable.

O2-22: This comment requests that a specific Recreation environmental topic section be provided in the PEIR consistent with Appendix G of the CEQA Guidelines. Please refer to response to comments O2-3, O2-6, and O2-11. No revisions to the PEIR are warranted.

O2-23

We appreciate the City's consideration of our comments and formally request this letter be included in the public record and addressed in the PEIR. Should you have any questions or need additional information, do not hesitate to contact PYSL at president@pyslsoccer.org.

Sincerely,



Justin Weber
Volunteer Board President
PYSL Board of Directors
president@pyslsoccer.org

PYSL Inc. dba Pacific Youth Soccer League
P.O. Box 9248
San Diego, CA. 92169
www.pacificyouthsoccer.org

Encl: Bob McEvoy Field Soccer Layout
Existing and Proposed Land Uses at Bob McEvoy Field

O2-23: This comment includes the commenter's name, role, and contact information. This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is warranted.





Comment Letter O3: Mission Bay Lessees Association, April 14, 2023

O3

From: [Stephanie Saathoff](#)
To: [B.N. Planning/CEQA](#)
Subject: [EXTERNAL] MBLA Comment letter re: De Anza Natural PEIR
Date: Saturday, April 15, 2023 4:24:41 PM
Attachments: [img003.png](#)
[MBLA Comment Letter re De Anza Natural PEIR.pdf](#)

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Please confirm receipt. Thank you!

[Mission Bay Lessees Association](#)

Stephanie Saathoff, President
Stephanie@theclayco.com

ClayCo

MISSION BAY LESSEES ASSOCIATION

2245 San Diego Avenue, Suite 222, San Diego, CA 92110
619-234-0607 mbia@theclayco.com

April 14, 2023

Scott Sandel, Project Manager
City of San Diego Planning Department
9485 Aero Drive, M.S. 413
San Diego, CA 92123
Submitted electronically: PlanningCEQA@sandiego.gov

RE: De Anza Natural Plan Environmental Impact Report

O3-1

The Mission Bay Lessees Association (MBLA) is comprised of the City of San Diego's tenants with leases in Mission Bay Park, providing access to overnight accommodations, recreation, entertainment, dining and many other amenities in Mission Bay Park beloved by San Diegans and visitors from around the world. We are part of the wide variety of opportunities that Mission Bay Park offers to users of all ages and abilities to enjoy a coastal experience. Our member lessees annually generate lease revenue for the City of San Diego that funds improvements to Mission Bay Park and San Diego's regional parks including Balboa Park, and drive our tourism economy.

O3-2

MBLA applauds the City's commitment to revitalizing northeast Mission Bay and appreciates the challenges inherent in balancing a wide array of needs and priorities. In the process of balancing those options, it is imperative that San Diego residents and visitors do not lose crucial, lower-cost accommodations and highly utilized recreation features.

O3-3


Public access to waterfront camping and coastal recreation constitutes a fundamental priority in both the California Coastal Act and the Mission Bay Park Master Plan. Section 30213 of the Coastal Act requires that "lower cost visitor and recreational facilities be protected and retained, encouraged and where feasible, provided."

The 1994 Mission Bay Park Master Plan Update allows for up to 60 acres of camping uses at De Anza and emphasizes that "RV facilities are essential to Mission Bay Park, as they provide access to the Bay to a sector of the population that cannot afford hotel accommodations and/or prefer the comfort and flexibility of a motor home. Such facilities should, therefore, remain as an integral part of the Park's diverse recreation matrix."

The current proposed De Anza Natural Plan and its alternatives would result in a substantial net reduction in the amount of camping access – in particular, campsites with direct access to the beach and bayfront of Mission Bay. We respectfully request that the De Anza Natural Plan programmatic EIR study directly respond to and comprehensively address the environmental and social impacts of demolishing highly utilized active public recreation areas and lower-cost visitor-serving accommodations.

It is imperative that access to recreational opportunities must be preserved and enhanced to ensure equitable access for generations to come. Thank you for your consideration.

Sincerely,


William L. Evans
President

O3-1: This comment provides an introduction to the Mission Bay Lessees Association and its role in Mission Bay Park. The City of San Diego (City) appreciates the Mission Bay Lessees Association's participation in the review of the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O3-2: This comment provides support for the City's commitment to revitalizing northeastern Mission Bay. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O3-3: This comment summarizes how waterfront camping and coastal recreation access are discussed in the California Coastal Act and the 1994 Mission Bay Park Master Plan Update, which allows for up to 60 acres of camping uses at De Anza Cove. In addition, this comment states that the current project and its alternatives would reduce campsites. As discussed in PEIR Chapter 3.0, Project Description, the project would replace much of the low-cost visitor guest accommodations offered by Campland on the Bay (Campland) and the Mission Bay RV Resort by offering 48.5 acres of new low-cost visitor guest accommodations, which would include land use for RVs, cabins, or other eco-friendly accommodations. No design is currently proposed; therefore, the exact number of RV and tent campsites to be provided is unknown at this time. Future projects will be subject to the City's General Development Plan (GDP) process. A GDP, as defined in City Council Policy 600-33, is a

Conceptual Master Plan that identifies the specific activities and amenities to be included within a park. As described in PEIR Section 1.4.1, Type of PEIR, GDPs will be developed over time and will provide precise engineering and construction plans for the recreational elements of the project.

The project also proposes active and passive recreational amenities to include but not be limited to sand volleyball, pickleball, tennis, walking, cycling, athletic fields, and inline/roller skating and a sandy beach area at the northern and western edges of De Anza Cove. The project includes a multi-use path that would connect the project area to points to the north, west, and east to enhance public equitable access and increase connections to the surrounding communities and would improve access to the park areas along the bay shoreline for residents and visitors.

This comment further requests that the PEIR address the environmental and social impacts of the loss of public recreation areas and lower-cost visitor-serving accommodations. California Environmental Quality Act (CEQA) Guidelines, Section 15131, specifically states that “economic or social effects of a project shall not be treated as significant effects on the environment.” CEQA defines “environment” as “the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance” (California Public Resources Code, Section 21060.5). An EIR project analysis is limited to those socioeconomic issues that could result in a direct change to the physical environment. As a result, the social effect of the project on current access to lower-cost overnight accommodations in Mission Bay and the

economic effect of the project on the reduction of the number existing campsites are not considered environmental issues and are not required to be analyzed.

Regarding the analysis of environmental impacts, the project is an Amendment to the Mission Bay Park Master Plan. No development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. As discussed above, GDPs will be developed over time and will provide precise engineering and construction plans for the recreational elements of the project. This PEIR programmatically addresses the environmental impacts of future implementation of the project and establishes a mitigation strategy that would apply to future improvements. When GDPs are available for all or portions of the project area, the City will evaluate the detailed plans against this PEIR and determine if the mitigation is adequate or if additional mitigation is warranted. No revisions to the PEIR are warranted.

Comment Letter O4: Pacific Beach Tennis Club, April 17, 2023

O4

From: [Joanna Hirst](#)
To: [P.U. Planning/CEQA](#)
Cc: [Joanna Hirst](#)
Subject: [EXTERNAL] Mission Bay Park
Date: Monday, April 17, 2023 12:39:23 PM

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DE ANZA NATURAL AND PEIR: COMMENTS RE ENVIRONMENTAL ISSUES.
APRIL 2023 BY JOANNA HIRST, BOARD OF DIRECTORS.
PACIFIC BEACH TENNIS CLUB.

The setbacks which De Anza Natural and the PEIR call for along Rose Creek appear to cause the loss of two of our eight tennis courts. These courts are also striped for eight pickle ball courts.

If the setbacks along Rose Creek are in fact determined to be an essential part of the ultimate GDP, we at Pacific Beach Tennis Club (PB Tennis Club) would request that the GDP identify an alternate location such that we have a contiguous total of eight lighted courts and a possible expansion to twelve courts to meet the demand caused by the loss of the 22 courts at San Diego Tennis and Racquet Club as well as the increased demand from the 9100 new dwelling units approved by the City Council near the Balboa and Tecolote Trolley stops.

Joanna Hirst
Phic.joanna@gmail.com
858-205-2708
San Diego, CA

O4-1: This comment states that the De Anza Natural Amendment to the Mission Bay Park Master Plan (project) appears to cause the loss of two tennis courts at the Pacific Beach Tennis Club and requests that the future General Development Plan identify an alternate location for the courts. Program Environmental Impact Report (PEIR) Figure 3-1, Site Plan, and Table 3-2, Proposed Land Use Acreages, have been revised in the Final PEIR to ensure a no net loss of acreage for active recreation uses. The City will strive to design and phase future development in a manner that minimizes disruption to active recreation access. Any necessary buffer zones and other land uses proposed on existing recreation facilities would be implemented after these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. No revisions to the PEIR are warranted.

O4-1

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Comment Letter O5: Southern California Golf Association, April 17, 2023

O5

O5-1: This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

From: [Craig Kessler](#)
To: [B.N. FlamingoCEQA](#)
Subject: [EXTERNAL] ATTN: Rebecca Malone -- Comment Letter re DE ANZA NATURAL AMENDMENT TO THE MISSION BAY PARK MASTER PLAN (Amendment to the Mission Bay Park Master Plan) SCH No: 2018061024
Date: Monday, April 17, 2023 10:46:25 AM
Attachments: Comments of Southern California Golf Association - DE ANZA NATURAL AMENDMENT TO THE MISSION BAY PARK MASTER PLAN Amendment to the Mission Bay Park Master Plan SCH Number 2018061024.pdf

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Dear Ms. Malone:

Attached please find a comment letter regarding the DE ANZA NATURAL AMENDMENT TO THE MISSION BAY PARK MASTER PLAN (Amendment to the Mission Bay Park Master Plan) SCH No: 2018061024. Please place into the record for consideration of the proposed amendment. The comments are submitted on behalf of the Southern California Golf Association (SCGA).

Thank you,

Craig

CRAIG KESSLER | Director, Public Affairs
SOUTHERN CALIFORNIA GOLF ASSOCIATION
3740 Calhoun Blvd., Studio City, CA 91604
(818) 990-3630 ext. 3207 / (310) 941-4803 (cell)
www.scga.org
International Country Club

O5-1



Southern California Golf Association
3740 Cahuenga Blvd., Studio City CA 91604 / (818) 980-3630 / www.scpa.org

April 17, 2023

Ms. Rebecca Malone
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123

Via E-mail: planningcpa@sandiego.gov

Subject: DE ANZA NATURAL AMENDMENT TO THE MISSION BAY PARK MASTER PLAN (Amendment to the Mission Bay Park Master Plan) SCH No: 2018061024

Dear Ms. Malone:

Identity of Commenter

05-2 The Southern California Golf Association (SCGA) is a 123-year-old non-charitable nonprofit corporation incorporated under the laws of the State of California to provide certain public benefits to 446 golf courses, 1,250 member clubs and 185,000 individual members. While the Association's offices are in Los Angeles, the SCGA is very much a region-wide organization. The following comments are submitted on behalf of the entire organization.

Requested Action

05-3 That per the "De Anza Cove Area - North" description of the "Project Components" as described in the Notice of Preparation, the Mission Bay Golf Course remain a fully intact component of the proposed De Anza Natural Plan, particularly now that the Parks Department has begun construction of an \$11 million capital improvement plan that includes a new irrigation system, new electrical system, new golf shop building, and new Food/beverage building, all paid out of proceeds from the city's golf enterprise fund.

Comments

05-4 Mission Bay is an 18-hole, par 58 executive golf course and practice facility, the only such facility with night lighting in San Diego. It has served the community for 66 years and provided San Diego residents with precisely the kind of accessible and affordable golf experience conducive of introducing young persons and young adults to the game so that the ranks of those capable of playing and enjoying the city's regulation 18-hole facilities (Torrey Pines and Balboa Park) continue to be replenished. It is also conducive of keeping seniors in a recreational activity that they might otherwise be forced to withdraw from, were their only choices very long and difficult courses such as Torrey Pines. The course has always played host to at least 60,000 + rounds over those 66 years and is playing host to roughly 50% more in the COVID era (102,000 rounds last year), which is indicative of the facility's strong market position, a position that promises to become considerably stronger once the facility is refurbished per extant plans of the city's Parks Department. The driving range alone brought in over \$1.1 million in revenue last year. Given that the Golf Division is ready to execute those refurbishments cum income generation plans, a De Anza Natural Plan that incorporates them into its greater plan for the entire Mission Bay recreational complex would

05-2: This comment introduces the Southern California Golf Association (SCGA). The City of San Diego (City) appreciates the SCGA's participation in the review of the PEIR for the project. This comment summarizes the SCGA's mission and does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

05-3: This comment requests that the Mission Bay Golf Course remain a fully intact component of the project. In response to this comment and others, PEIR Figure 3-1, Site Plan, and PEIR Table 3-2, Proposed Land Use Acreages, have been revised in the Final PEIR to reflect no net loss of active recreation use acreages, including the area occupied by the Mission Bay Golf Course. In addition, the City will strive to plan for future facilities with design and phased development in a manner that minimizes disruption to active recreation access. Any necessary buffer zones and other land uses proposed on existing recreation facilities would be implemented after these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. The existing uses, including the Mission Bay Golf Course, form the baseline from which the PEIR evaluates the impacts of the project at the program level. Improvements to current facilities may be implemented as future projects come forward. Future projects will be subject to the City's General Development Plan process to ensure that all requirements are met before they are approved.

05-4: This comment describes the Mission Bay Golf Course and summarizes the environmental benefits of golf properties. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

O5-4 cont. allow for a newly renovated Mission Bay Golf Club to become one of the first anchors of a greater De Anza recreational complex.

Golf is a critical component of San Diego's economy, particularly that portion of it related to tourism. While Torrey Pines and the city's many resort and daily fee courses are the facilities that most come to mind when tallying up the dollars generated thereby, one must not forget that courses such as Mission Bay are the ones that provide the front-end portal for those back-end dollars — the non-glamorous boiler room of the industry's economic engine, albeit a "boiler room" that generates real dollars while providing recreation to thousands of San Diego residents.

The SCGA would also add the following points concerning the many environmental benefits of golf properties, including but certainly not limited to the following:

- Turf grass acts as a filter that traps pollutants before they reach groundwater supplies;
- Turf grass reduces greenhouse emissions;
- Golf courses function as fire breaks;
- Golf courses prevent erosion and thus mitigate flooding during heavy storms; and
- Golf courses provide habitat for migrating birds and other wildlife.

Conclusion

O5-5 Mission Bay Golf Club is a valuable recreational and financial asset as is. It promises to become a considerably more valuable recreational and financial asset as soon as the city completes all of the improvements envisaged by the \$11 million project now underway. This would be consistent with every iteration of the various De Anza Revitalization and/or Master Plans that have come under consideration to date; however, this latest amendment, while it does not specifically reduce the acreage of the extant Mission Bay Golf Club, it does in two of its options reduce the amount of acreage dedicated to "active recreation" on the site — substantially in one option in particular. The expense of such a reduction cum re-routing of the extant golf course would be onerous, and the resulting economic robustness of the remnant golf facility would be seriously diminished as a direct result. The impact of neither outcome is addressed in the subject "amendment."

O5-6 The City Planners' decision to keep the De Anza Cove North Area as an active recreation amenity replete with golf and other active recreational activities is in keeping with the balanced approach the project's planners have taken thus far with respect to this revitalization effort from day one, and a balanced approach heardly endorsed by the Southern California Golf Association and its members and member clubs in San Diego. We strongly encourage continuation of the approach.

On behalf of the SCGA and its 190,000 members in general and San Diego members in particular, I want to thank you for considering our views.

Respectfully Submitted,

Craig Kessler

CRAIG KESSLER, Director, Public Affairs
SOUTHERN CALIFORNIA GOLF ASSOCIATION
 3740 Cahuenga Blvd., Studio City, CA 91604
 818-980-3630 ext. 320 / 310-941-4803 (cell)
www.scga.org

O5-5: This comment states that the Mission Bay Golf Course is a valuable recreational and financial asset and that the proposed Amendment would reduce the acreage dedicated to active recreation on the site. Please refer to response to comment O5-3. The Final PEIR has been revised to reflect no net loss of active recreation use acreages.

In addition, the comment states that financial implications of a remnant golf facility should be addressed in the proposed Amendment. California Environmental Quality Act (CEQA) Guidelines, Section 15131, specifically states that "economic or social effects of a project shall not be treated as significant effects on the environment." CEQA defines "environment" as "the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance" (California Public Resources Code, Section 21060.5). An EIR project analysis is limited to those socioeconomic issues that could result in a direct change to the physical environment. As a result, the economic cost of the project is not required to be analyzed in the PEIR. No revisions to the PEIR are warranted.

O5-6: This comment states that the commenter strongly encourages the decision to keep the De Anza Cove North Area as an active recreation amenity with golf and other active recreational activities as a balanced approach. The Mission Bay Park Master Plan calls for a "balanced approach" with three components: recreation, commerce, and environment. Please refer to response to comment O5-3. The Final PEIR has been revised to ensure no net loss of active recreation use acreages.

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Comment Letter O6: Environmental Center of San Diego, April 18, 2023

O6

From: [Pam Heatherington San Diego](#)
To: [E.N. Planning/CEQA](#)
Subject: [EXTERNAL] Proposed Amendment to the Mission Bay Parks Master Plan and De Anza Natural -Draft PEIR
Date: Tuesday, April 18, 2023 9:46:16 PM
Attachments: [Comments on DeAnza Natural DEIR \(3\).docx](#)

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Dear Planning staff,

O6-1

Please see our comments regarding the De Anza natural DEIR. We look forward to your responses and the updating of the Plan.

Pamela Heatherington
Board of Directors
Environmental Center of San Diego

O6-1: This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.



April 19, 2023

Attn: Heidi Vonblum
Planning Director
City of San Diego Planning Department
9485 Aero Dr, M.S. 413
San Diego, CA 92123
Via Email: PlanningCEQA@sandiego.gov

RE: Proposed Amendment to the Mission Bay Parks Master Plan and De Anza Natural -Draft PEIR

O6-2 Thank you for the opportunity to comment on the Mission Bay Master Plan (MBMP) Amendment, De Anza Natural. While the City has come some distance in recognizing the importance of restoring the natural habitat in the northeast section of Mission Bay, they are falling short in both the areas of potential for the site and restoration efforts that are needed to abate sea level rise and climate disruption. We find the following:

Water quality:

O6-3 The MBMP amendment states that "De Anza Natural shall not be developed to the detriment of existing and/or future adjacent habitat areas. Foremost in consideration should be the extent to which the area can contribute to the Park's water quality."
The city's draft EIR must prioritize water quality in Mission Bay. A targeted project objective needs to be added "Improve the water quality of the study area and the bay through natural, resilient wetland infrastructure" The 1994 Mission Bay Park Master Plan demands it. The MBPMP amendment states that "De Anza Natural shall not be developed to the detriment of existing and/or future adjacent habitat areas. How does the MBMP Amendment address this?"

The Draft PEIR seems to be in conflict with this statement as it lays out land uses that may preclude development of future adjacent habitat areas due to the lack of modeling done in the Draft PEIR. (Comments from the Friends of Rose Creek on the Draft PEIR.)

How will you reconcile your proposal with improving water quality?

Environmental Center of San Diego contactecoso@gmail.com 805-835-1833

O6-2: This comment provides an introduction to the comment letter. The City of San Diego (City) appreciates the Environmental Center of San Diego's participation in the review of the PEIR for the project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

O6-3: This comment states that the PEIR must prioritize water quality in Mission Bay and that a new objective should be added to improve water quality. The comment further asks how the proposed Amendment addresses that the project shall not be developed to the detriment of existing and/or future adjacent habitat areas. Please refer to the responses to comment letter O17 (Friends of Rose Creek comment letter). The Mission Bay Park Master Plan (MBPMP) calls for a "balanced approach" with three components: recreation, commerce, and environment, as reflected by the project.

Furthermore, the PEIR Section 4.7: Hydrology and Water Quality concludes that the project would have the potential to result in long-term operational pollutants associated with components of the project, such as low-cost visitor guest accommodations, parking areas, and street improvements, that would introduce potential pollutants, including sediments, heavy metals, nutrients, trash and debris, oxygen-demanding substances, oil and grease, pesticides, and bacteria and viruses, due to the project's location within and adjacent to Rose Creek and Mission Bay. However, in accordance with the City's Stormwater Standards Manual, the project is a priority development project that is required to incorporate post-

construction (or permanent) Low Impact Development site design, source control, and treatment control best management practices (BMPs) into the project's design. The types of BMPs that could be implemented are listed in PEIR Table 5.7-1, Recommended Best Management Practices. The BMPs are preliminary recommendations and would be refined and implemented as part of final project design and monitoring programs for future project activities consistent with the project in accordance with the City's Stormwater Standards Manual that requires the preparation of a Stormwater Quality Management Plan. The Stormwater Quality Management Plan must accompany the final design of subsequent project activities to ensure that runoff generated by the project is adequately captured/treated per applicable federal, state, and local regulation.

In addition, the project proposes water quality design features along the edges of active recreational areas. Proposed water quality detention basins would be different sizes and would capture and treat stormwater before it flows into Mission Bay. New water quality detention basins would be located to treat the entire project area in accordance with local and state requirements. Water quality detention basins would be designed with a sediment forebay, a height-appropriate embankment specific for each area of treatment, and a base to reduce sediment and erosion at the outflow. Native plants would be used to reduce sediment and total suspended solids from stormwater. Additional water quality-enhancing features would include vegetated areas bordering all development to reduce stormwater

contamination, including debris and sediment, from reaching Mission Bay.

In addition, revegetating the edges of Rose Creek and along the “boot” of De Anza Cove with marsh, wetland, and upland native plants would create another water quality-enhancing feature. In addition, “green” infrastructure such as constructed oyster beds could be implemented at shorelines where oyster colonization is feasible. Because oysters feed by filtering algae from the water, they function as a natural filter and improve water overloaded with nutrients.

The project objectives listed in PEIR Chapter 3, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Chapter 5.7, Hydrology and Water Quality, for a discussion of how the proposed project’s design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

	Sea Level Rise:
O6-4	<p>The analysis found in the DEIR needs to examine the impact of sea rise on all of Mission Bay including the study area at DeAnza cove. Climate disruption and its resulting sea level rise will impact Mission Bay directly. The impacts will not be segmented into isolated areas. The DEIR is missing impacts from climate change because no analysis has been done of how sea level rise affects the proposal. The impacts to existing and proposed habitats, as well as the proposed location of low-cost guest accommodation being so close to the shoreline, will be impacted as sea levels rise but no analysis is given.</p> <p>Please add an analysis between the Wetland Optimized Alternative and ReWild in order to examine mitigating the impact of sea rise. Each offers perspectives that will inform the best land-use plan for the whole of Mission Bay.</p>
	Environmental Concerns:
O6-5	<p>The city received funding from the Regional Water Quality Control Board for this land use proposal through R9-2020-0150 SEP, and must comply with the components of that agreement. The DEIR does not maximize implementable wetland restoration shown to be feasible in the ReWild Mission Bay Feasibility Study Wildest Alternative. Why is the city ignoring these requirements?</p>
O6-6	<p>The city is currently in litigation with Coastal Environmental Rights Foundation (CERF) and Climate Action Campaign to force an achievable CAP implementation plan and this DEIR needs to show how the CAP requirement of 700 acres of tidal wetland restoration is achievable if the city does not adopt a plan with maximized wetlands restoration.</p>
O6-7	<p>The city's De Anza Natural website includes an introduction to the project and states: "Sea level rise modeling developed by the United States Geological Survey for Mission Bay and De Anza has been taken into account during the development of De Anza Natural." That modeling is not included nor analyzed in the DEIR. Why is this not explicated in the DEIR?</p>
	Rose Creek:
O6-8	<p>Since water quality improvement is the main goal of the Mission Bay Park Master Plan for this area, water quality impairment of Rose Creek needs to be addressed.</p> <p>Rose Creek is currently the largest source of fresh water that flows into Mission Bay and the best location for substantial wetlands restoration. Wetland restoration is the best use of this area within Mission Bay Park</p> <p>We agree that although the DEIR mentions Rose Creek many times, it fails to assess the benefits of restored wetlands to the Rose Creek ecosystem which is a tributary to</p>

Environmental Center of San Diego contactecoso@gmail.com 805-835-1833

O6-4: This comment states that the PEIR needs to examine the impact of sea level rise on all of Mission Bay, including the project area at De Anza Cove. A Sea Level Rise Assessment Technical Report was prepared for the project and the Wetlands Optimized Alternative and is incorporated into the Final PEIR as Appendix N. This analysis includes a study of sea level rise projections in year 2100 in accordance with the requirements of the Supplemental Environmental Project.

This comment then goes on to state that the PEIR should contain an analysis between the Wetlands Optimized Alternative and the ReWild Mission Bay alternatives. The PEIR complies with the SEP by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b). The ReWild Mission Bay "Wild," "Wilder," and "Wildest" alternatives are discussed in Section 8.2, Alternatives Considered and Eliminated.

The MBPMP calls for a "balanced approach" with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project proposes 146.5 acres of active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

The "Wild" and "Wildest" alternatives would not fully consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5) because they lack sufficient site areas for a balance of land uses, including enough site area for recreation and low-cost visitor guest accommodation, and as a result, they would also not provide enough equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access (project objective 1). The "Wilder" and "Wildest" alternatives would also fail to meet project objective 5 because they would reduce the amount of area available for aquatic recreation uses, such as the enjoyment of open beach sand activities and boating.

Therefore, while all three of these alternatives would identify environmental uses, they would not consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5). These alternatives would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2) as the project would, and while these alternatives would provide bike and pedestrian pathways, they would not prioritize public access and connectivity to the extent that the project would, or activation of the shoreline (project objective 6). The three ReWild alternatives would not enhance public access or provide equitable access to De Anza Cove because of how those plans laid out the habitat design to reduce access to the cove's shorelines compared to the project. Therefore, while these alternatives would meet project objectives 3 and 4 by incorporating climate adaptation strategies and embracing responsibility and stewardship of the

environment, they would not meet most of the project objectives. Thus, they have been eliminated from further consideration.

- O6-5:** This comment states that the PEIR must comply with the requirements of the Regional Water Quality Control Board SEP. The SEP requires the City to include additional environmental review and consideration of an expanded wetlands restoration alternative that would result in the establishment of 80 acres of additional functional wetlands at the year 2100 in the PEIR. The PEIR complies with the SEP by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail as the proposed project in PEIR Chapter 8.0, Alternatives.

The comment also states that the PEIR does not maximize implementable wetland restoration shown to be feasible in the ReWild Mission Bay “Wildest” alternative. Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. PEIR Chapter 8.0 evaluates four alternatives that were selected for additional analysis. In addition, PEIR Chapter 8.0 also identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the ReWild Mission Bay “Wildest” proposal, is provided in PEIR Chapter 8.0. PEIR Chapter 8.0

provides an analysis of the Wetlands Optimized Alternative at an equal level of detail with the project in accordance with the Supplemental Environmental Project grant. The Wetlands Optimized Alternative would increase the acres of wetlands and associated transitional zones and uplands to be created and restored in northeastern Mission Bay, converting the southern portion of the De Anza “boot” and open water areas of De Anza Cove to wetlands. The Wetlands Optimized Alternative would maximize implementable wetland restoration generally reflective of existing feasibility studies for Mission Bay and would provide diverse beneficial uses, such as active recreation, regional parklands, open beach, low-cost visitor guest accommodations, boat facilities/clubhouse, uplands, multi-use paths, wetlands, and an Interpretive Nature Center. PEIR Section 8.3.2.3, Relationship to Project Objectives, concludes that the Wetlands Optimized Alternative would not meet project objectives 1 and 6 because, compared to the project, it would not fully provide equitable access or enhance the public access of De Anza Cove. The Wetlands Optimized Alternative would convert the southern portion of the developed De Anza “boot” and the De Anza Cove open water areas to wetlands. This would result in a reduction in low-cost visitor guest accommodations and open beach uses. Furthermore, the Wetlands Optimized Alternative would not fully implement project objective 5 because active and passive recreational uses would be further reduced, reducing the customer base and opportunities for passive and active recreation compared to the project. No revisions to the PEIR are warranted.

- O6-6:** This comment states that the PEIR needs to show how the City's Climate Action Plan (CAP) requirement of 700 acres of tidal wetland restoration is achievable if the City does not adopt a plan with maximized wetlands restoration. Other restoration areas within the City's jurisdiction are being considered to meet the goals of the City's CAP. The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 225.1 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 700-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City-managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.
- O6-7:** This comment states that sea level rise modeling identified on the City's project website is not included or analyzed in the PEIR. Please refer to response to comment O6-4.
- O6-8:** This comment states that the PEIR fails to assess the benefits of restored wetlands to the Rose Creek ecosystem, which is required under CEQA. The City agrees that increasing wetlands would enhance water quality; however, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify

O6-8 cont. Mission Bay and is located in the very heart of the proposed wetlands. A restored marsh could reduce or eliminate the eutrophication of the area that is mentioned in the DEIR. This analysis of the positive impact of a project to surrounding ecosystems is required under the California Environmental Quality Act. Why is it not discussed more thoroughly in the DEIR?

O6-9 **First People's input:**
Where in the DEIR is Tribal input? Project Objective 2 is to "Foster opportunities for members of local Tribal nations to reconnect to De Anza Cove." The city has not reached out to receive substantial input from the Kumeyaay and other Indigenous partners. Working with Tribal nations must be done before any further efforts are made in this, their tribal lands.

O6-10 We know, as Dr. Zirk points out, for millennia, local tribal nations engaged with the salt marshes that once existed throughout much of Mission Bay. The salt marsh plants, birds, wildlife, and fish are what constitute re-connection, not access to a man-made park. Since lower Rose Creek supports native species and it is affected by the preferred project as well as most alternatives, the potential impact to native migratory fish must be evaluated. For the City of San Diego to move forward with tribal relations, references to the historic connections between different bands of indigenous nations and the original 4,000 acres wetlands complex should be indicated in the Executive Summary (ES) of the MBPMP. Furthermore, the ES should state that the city is committed to partnering with local tribes and incorporate language related to tribal relations from the Parks Master Plan into the MBPMP amendment either explicitly or by reference.

O6-11 **Definition of low-cost visitor serving amenities:**
We take issue with the fact that low-cost visitor accommodations are already being pitched as recreational vehicles. The Coastal Commission does not view RV's as low-cost visitor serving. A survey done a few years back proved that hotels in the area were more affordable than RV spaces. There is a wide range of low-cost alternatives such as yurts, cabins, and tent camping. Please add these to the list and remove RV's as low-cost amenities.

O6-12 **Public access:**
The northeast corner of Mission Bay has been a hot bed of illegal uses. De Anza point was privatized as an upper end mobile home park with lower cost mobile homes situated away from the bay front. For over 50 years the city ignored the Public Trust Doctrine and their commitment to uphold the terms of it by using public lands for private use.
Campland was fined by the Coastal Commission and contacted by the State Lands Commission for blocking public access for over two generations. Another misstep by the city for not doing their due diligence managing public tidelands.

the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." As discussed in PEIR Chapter 3.0, the project would include wetlands enhancement and restoration in City-owned portions of the existing Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP), the area currently occupied by Campland on the Bay (Campland), the eastern side of Rose Creek, and the areas in De Anza Cove currently occupied by the vacated mobile home park and open water. To the west of Rose Creek, the project seeks to implement the vision of the MBPMP by removing Campland and replacing it with habitat contiguous to the existing KFMR/NWP. The project objectives include project objective 3 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. The project's wetland restoration component would improve water quality. The project would expand the project area's natural habitat and improve water quality through the creation of additional wetlands. No revisions to the PEIR are warranted.

O6-9: This comment requests information regarding Tribal input on the PEIR. As discussed in PEIR Section 5.6, Historical, Archaeological, and Tribal Cultural Resources, Tribal consultation in accordance with Assembly Bill 52 was conducted in 2019 with the Jamul Indian Village and the Lipay Nation of Santa Ysabel. Additional Tribal consultation pursuant to Assembly Bill 52 occurred in 2023. In addition, the local Native American Kumeyaay community has expressed a high level of interest with regard to potential impacts to known resources in and around the project area. Therefore, the PEIR includes mitigation measures to reduce

impacts related to inadvertent discoveries to a less than significant level. As discussed in PEIR Chapter 3.0, the project would also include an Interpretive Nature Center, which would foster opportunities for members of local Tribal nations to reconnect to De Anza Cove in line with Project Objective 2.

O6-10: This comments states that the project should incorporate language related to Tribal relations into the MBPMP either explicitly or by reference. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR, and no further response is warranted.

This comment states that the potential impact to native migratory fish must be evaluated. PEIR Section 5.3.3.1, Issue 1: Sensitive Species, concludes that project-related construction activities could result in the generation of sound exposure levels high enough to cause hydroacoustic effects on marine species, including marine fish, marine mammals, and green sea turtles, with potential to occur in the project area, which would result in a potentially significant indirect impact. Mitigation Measure MM BIO 5.3-6 requires that a Hydroacoustic Study be prepared prior to subsequent project-level approval and prior to any construction activities in the waters of Mission Bay to determine if the activities have potential to generate a sound exposure level exceeding the exposure level thresholds.

PEIR Section 5.3.3.1 of the Final PEIR has been updated to clarify that the project's direct and indirect impacts to sensitive species may include marine fish and invertebrate

species that have potential to occur in the project area. Refer to response to comment S2-11 in comment letter S2 (California Department of Fish and Wildlife, South Coast Region 5, comment letter). As discussed in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. Site-specific species surveys for marine fish and invertebrate species are not appropriate at the programmatic level. The mitigation framework provided in the PEIR is adequate for program-level environmental review of the project. Once future project-specific design has been finalized and prior to approval, the City will route the project through the Public Project Assessment process, including the preparation of the appropriate environmental documentation in accordance with CEQA. At that time, potential impacts to marine fish and invertebrate species would be identified, species-specific surveys may be conducted, and mitigation measures would be developed based the site-specific impacts of the proposed General Development Plan and the mitigation strategy outlined in the PEIR. No additional revisions to the PEIR are warranted.

O6-11: This comment requests that yurts, cabins, and tent camping be added to the list of low-cost visitor guest accommodations and that RVs be removed. As discussed in PEIR Chapter 3.0, the low-cost visitor guest accommodation land use would allocate approximately 48.5 acres for RVs, cabins, or other ecofriendly accommodations and associated open space and facilities consistent with camping accommodations. Other ecofriendly accommodations could include yurts and tent

camping. As discussed in PEIR Chapter 3.0, no design is currently proposed. Therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. The PEIR acknowledges that the City will evaluate future detailed General Development Plans for future projects as they are developed. A General Development Plan, as defined in City Council Policy 600-33, is a Conceptual Master Plan that identifies the activities and amenities to be included in a park. As described in PEIR Section 1.4.1, Type of PEIR, General Development Plans will be developed over time and will provide precise engineering and construction plans for the recreational elements of the project. The recommendations identified in the comment would be more appropriate to submit for consideration during future site-specific planning and implementation of the low-cost visitor guest accommodation land use projects.

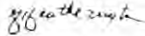
O6-12: This comment provides examples of uses in Mission Bay Park and states that oversight of Mission Bay Park in relationship to the Public Trust Doctrine must be identified in the PEIR. No land uses that would conflict with the Public Trust Doctrine are proposed. Please refer to response to comment O6-12.

O6-12
cont. Paradise Point is yet another example of the city's failure to protect public access. Many other hotels dot the bay.
How will oversight be handled so that the Public Trust Doctrine is adhered to in all areas of the public trust tidelands? This needs to be spelled out in the EIR lest we have continuing violations to the Public Trust Doctrine and the public's access to the tidelands

O6-13 In addition, Mission Bay Park has a level of public transit access that is not available for many other salt marshes in the county. Why isn't it included in the EIR?

O6-14 In closing, the Environmental Center of San Diego is dedicated to the protection and enhancement of our natural environment and public access where feasible. We are proud members of the ReWild Coalition and offer these comments in addition to those submitted by the Coalition.

Respectfully,



George Heatherington, Chair
Board of Directors
Environmental Center of San Diego

O6-13: This comment states that the level of public transit access for Mission Bay Park should be included in the PEIR. As identified in PEIR Chapter 2.0, Environmental Setting, the Mid-Coast Trolley, which consists of the Metropolitan Transit System Blue Line Trolley line extension from Downtown San Diego to the University community, is east of the project area. The Balboa Avenue Station is south of Balboa Avenue, 0.25 mile northeast of the project area, and the Clairemont Drive Station is south of Clairemont Drive, 0.75 mile southeast of the project area. As discussed in PEIR Section 5.10, Transportation and Circulation, the Balboa Avenue Station and the Clairemont Drive Station would provide region-serving high-quality light-rail transit to the project area. Therefore, the PEIR addresses public transit access to the project area. No revisions to the PEIR are warranted.

O6-14: This comment provides the mission of the Environmental Center of San Diego and is a closing comment. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR, and no further response is warranted.

Comment Letter O7: Sierra Club, San Diego Chapter, April 18, 2023

O7

From: [Ron Askeland](#)
To: [PLN_PlanningCEQA](#)
Cc: [Sabol, Scott](#); [Gloria, Todd](#) (External); [CouncilMember Zoe LaCava](#); [Richard Miller](#); [Lea Ross](#); [Pam Heatheninton](#); [ron.askeland@gmail.com](#)
Subject: [EXTERNAL] Sierra Club San Diego comment letter on De Anza DEIR
Date: Tuesday, April 18, 2023 2:27:05 PM
Attachments: [Sierra Club Rewild Letter.pdf](#)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Ms. Vonblum and the San Diego Planning department staff,
The attached letter provides the San Diego Sierra Club's comments on the DEIR for the De Anza Cove Amendment to the Mission Bay Park Master Plan.

Sincerely,
Dr. Peter Andersen, Vice Chairperson
Sierra Club San Diego Conservation Committee

Dr. Ron Askeland, Chairperson
Sierra Club San Diego Conservation Committee

O7-1: This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

O7-1



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April 17, 2023

Attn: Heidi Vonblum
Planning Director
City of San Diego Planning Department
9485 Aero Dr, M.S. 413
San Diego, CA 92123

Via Email:

PlanningCEQA@sandiego.gov

cc

Richard Miller <richard.miller@sierraclub.org>

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Scott Sandel ssandel@sandiego.gov

Dear Ms. Vonblum and the San Diego Planning department staff

O7-2

First and foremost, we complement the City of San Diego on behalf of Sierra Club San Diego on your serious efforts to rewild the northeast corner of Mission Bay. The proposed project is a legitimate attempt to balance interests and to plan an expanded wetland for the De Anza cove area of Mission Bay. Like the Audubon Society here in San Diego, Sierra Club San Diego has consistently supported the “Wildest” wetland restoration as the best plan for Mission Bay. We advocate the largest wetland alternative possible and particularly applaud the conversion of the

O7-2: This comment describes the Sierra Club, San Diego Chapter, and its support for the Rewild Mission Bay “Wildest” wetland restoration plan. The City of San Diego (City) appreciates the Sierra Club’s participation in the review of the PEIR for the project. This comment provides an introduction and includes the preference for the largest wetland alternative possible. The comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O7-2 cont. | mobile home park to wetlands, removal of the developed areas of Campland, and removal of the Mission Bay Boat and Ski Club in favor of wetlands restoration.

O7-3 | Among the several alternatives presented in the DEIR, the Sierra club strongly favors the "Wetlands Optimized Alternative" which is closest to Audubon Society's "wildest plan." As stated in the DEIR "The Wetlands Optimized Alternative would maximize implementable wetland restoration generally reflective of existing feasibility studies for Mission Bay and would provide diverse beneficial uses, such as active recreation, regional parklands, open beach, low-cost visitor guest accommodations, boat facilities/clubhouses, uplands, multi-use paths, wetlands, and an Interpretive Nature Center." The "proposed project" is a good attempt at conservation and would have several benefits. However, the "Wetlands Optimized Alternative" has even greater benefits to sea rise resilience, greenhouse gas (GHG) reduction, water purification, active recreation, ecotourism, equitable access, wildlife conservation, and habitat restoration. We urge the city to reconsider their analysis and select the "Wetlands Optimized Alternative" as the preferred alternative.

The DEIR needs to review the history of Mission Bay which historically was wetland, marsh, and saltwater bay. It was human intervention that created a recreational waterway with hotels, residences, boating, and recreation. The goal should be to return as much of Mission Bay as is possible to its natural state without disrupting many of its current uses. To achieve this goal, the Sierra Club advocates adoption of the Wetlands Optimized Alternative as the eventual plan for the rewilding of Mission Bay.

O7-4 | The "wildest plan" or the "Wetlands Optimized Alternative" would restore important wild habitat, sequester carbon, protect against sea rise, provide sanctuary for birds and other animals, and help improve water quality in Mission Bay. It would also provide an important recreational opportunity for San Diegans to visit and view native habitat.

O7-5 | Overall, the De Anza natural DEIR provides a good analysis for the potential to rewild mission bay. That said, there are deficiencies in the DEIR that need to be remedied before the final EIR is promulgated and the preferred alternative is accepted.

O7-3: This comment provides support for the Wetlands Optimized Alternative and requests that the City select this as the preferred alternative. PEIR Chapter 8.0, Alternatives, provides an analysis of the Wetlands Optimized Alternative at an equal level of detail as the project in accordance with the City's awarded Supplemental Environmental Project grant. The Wetlands Optimized Alternative would increase the acres of wetlands and associated transitional zones and uplands to be created and restored in northeastern Mission Bay, converting the southern portion of the De Anza "boot" and open water areas of De Anza Cove to wetlands. The Wetlands Optimized Alternative would maximize implementable wetland restoration generally reflective of existing feasibility studies for Mission Bay and would provide diverse beneficial uses, such as active recreation, regional parklands, open beach, low-cost visitor guest accommodations, boat facilities/a clubhouse, uplands, multi-use paths, wetlands, and an Interpretive Nature Center. PEIR Section 8.3.2.3, Relationship to Project Objectives, concludes that the Wetlands Optimized Alternative would not meet project objectives 1 and 6 because, compared to the project, it would not fully provide equitable access or enhance the public access of De Anza Cove. The Wetlands Optimized Alternative would convert the southern portion of the developed De Anza "boot" and the De Anza Cove open water areas to wetlands. This would result in a reduction in low-cost visitor guest accommodations and open beach uses. Furthermore, the Wetlands Optimized Alternative would not fully implement project objective 5 because active and passive recreational uses would be further reduced,

reducing the customer base and opportunities for passive and active recreation compared to the project.

This comment also requests that the PEIR review the history of Mission Bay. In accordance with the California Environmental Quality Act (CEQA), the impacts of a project must be evaluated by comparing expected environmental conditions after project implementation to conditions at a point in time referred to as the baseline. CEQA Guidelines, Section 15125, states that an EIR must include a description of the physical environmental conditions within the vicinity of the project as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis starts, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. No revisions to the PEIR are warranted.

O7-4: This comment states that the “wildest plan” or “Wetlands Optimized Alternative” would restore important wild habitat, sequester carbon, protect against sea level rise, provide sanctuary for birds and other animals, and help improve water quality in Mission Bay. Please refer to response to comment O7-3.

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. PEIR Chapter 8.0 evaluates four

alternatives that were selected for additional analysis. In addition, PEIR Chapter 8.0 also identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the ReWild Mission Bay “Wildest” proposal, is provided in PEIR Chapter 8.0.

PEIR Chapter 8.0 provides an analysis of the Wetlands Optimized Alternative at an equal level of detail with the project in accordance with the Supplemental Environmental Project grant. The Wetlands Optimized Alternative would increase the acres of wetlands and associated transitional zones and uplands to be created and restored in northeastern Mission Bay, converting the southern portion of the De Anza “boot” and open water areas of De Anza Cove to wetlands. The Wetlands Optimized Alternative would maximize implementable wetland restoration generally reflective of existing feasibility studies for Mission Bay and would provide diverse beneficial uses, such as active recreation, regional parklands, open beach, low-cost visitor guest accommodations, boat facilities/clubhouse, uplands, multi-use paths, wetlands, and an Interpretive Nature Center. PEIR Section 8.3.2.3, Relationship to Project Objectives, concludes that the Wetlands Optimized Alternative would not meet project objectives 1 and 6 because, compared to the project, it would not fully provide equitable access or enhance the public access of De Anza Cove. The Wetlands Optimized Alternative would convert the southern portion of the developed De Anza “boot” and the De Anza Cove

open water areas to wetlands. This would result in a reduction in low-cost visitor guest accommodations and open beach uses. Furthermore, the Wetlands Optimized Alternative would not fully implement project objective 5 because active and passive recreational uses would be further reduced, reducing the customer base and opportunities for passive and active recreation compared to the project. No revisions to the PEIR are warranted.

O7-5: This comment states that there are deficiencies in the PEIR that need to be remedied before approval of the Final PEIR. This comment is an introduction to the concerns. No further response is warranted.

07-6
07-7
07-8

- **Tribal Input is Lacking.** Project objective 2 is to “Foster opportunities for members of local Tribal nations to reconnect to De Anza Cove.” However, the City of San Diego has not reached out to receive substantial input from the Kumeyaay and other Indigenous partners. The City’s process for working with Tribal nations must be improved. Reconnection requires access to a natural environment of salt marsh plants, birds, wildlife, and fish.
- **Movement of any native resident or migratory fish or wildlife species.** The DEIR states that no mitigation measures are required for the environmental issue “Would the proposed project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP SAP, or impede the use of native wildlife nursery sites?”. Since lower Rose Creek supports native species and it is affected by the preferred project as well as most alternatives, the potential impact to native migratory fish must be evaluated.
- **Ecotourism is Underestimated.** The DEIR fails to sufficiently analyze the great recreational and tourism benefits of rewilding mission bay. The DEIR erroneously states: “However, overall, the Wetlands Optimized Alternative would reduce the amount of active recreational activities to approximately 49.9 acres compared to approximately 60.1 acres under the proposed project.” This analysis is incorrect because it fails to recognize the substantial recreational value of the Wetlands alternative. The restored Wetlands Optimized alternative will be a magnet for nature lovers, students, birdwatchers, researchers, hikers, runners, kayakers, and fisherman. The DEIR is biased toward motorized and developed uses of the area and needs to be amended. As a result, the DEIR incorrectly concludes that: “the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums.” The failure to fully consider hiking, kayaking, fishing, birdwatching, research, jogging and biking leads to the erroneous conclusion that a restored marsh would not have balanced recreation. A revised EIR should fully consider the numerous recreational uses of a maximally restored wild Mission Bay.

07-6: This comment states that Tribal input is lacking. As discussed in PEIR Section 5.6, Historical, Archaeological, and Tribal Cultural Resources, Tribal consultation in accordance with Assembly Bill 52 was conducted in 2019 with the Jamul Indian Village and the Lipay Nation of Santa Ysabel. Additional Tribal consultation pursuant to Assembly Bill 52 was conducted in 2023. The local Native American Kumeyaay community has expressed a high level of interest regarding potential impacts to known resources in and around the project area. Therefore, the PEIR includes mitigation measures to reduce impacts related to inadvertent discoveries to a less than significant level. As discussed in PEIR Chapter 3.0, Project Description, the project would also include an Interpretive Nature Center, which would foster opportunities for members of local Tribal nations to reconnect to De Anza Cove.

07-7: This comment states that the potential impact to native migratory fish must be evaluated. PEIR Section 5.3.3.1, Issue 1: Sensitive Species, concludes that project-related construction activities could result in the generation of sound exposure levels high enough to cause hydroacoustic effects on marine species, including marine fish, marine mammals, and green sea turtles, with potential to occur in the project area, which would result in a potentially significant indirect impact. Mitigation Measure MM BIO 5.3-6 requires that a Hydroacoustic Study be prepared prior to subsequent project-level approval and prior to any construction activities in the waters of Mission Bay to determine if the activities have potential to generate a sound exposure level exceeding the exposure level thresholds.

PEIR Section 5.3.3.1 of the Final PEIR has been updated to clarify that the project’s direct and indirect impacts to sensitive species may include marine fish and invertebrate

species that have potential to occur in the project area. Refer to response to comment S2-6 in comment letter S2 (California Department of Fish and Wildlife, South Coast Region 5, comment letter). As discussed in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. Site-specific species surveys for marine fish and invertebrate species are not appropriate at the programmatic level. The mitigation framework provided in the PEIR is adequate for program-level environmental review of the project. Once future project-specific design has been finalized and prior to approval, the City will route the project through the Public Project Assessment process, including the preparation of the appropriate environmental documentation in accordance with CEQA. At that time, potential impacts to marine fish and invertebrate species would be identified, species-specific surveys may be conducted, and mitigation measures would be developed based the site-specific impacts of the proposed General Development Plan and the mitigation strategy outlined in the PEIR. No additional revisions to the PEIR are warranted.

- 07-8:** This comment states that the PEIR should fully consider the numerous recreational benefits of a maximally restored wild Mission Bay. The City agrees that increasing restoration of Mission Bay would have recreational benefits; however, as stated in CEQA Statute Section 21002.1, “The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.” No revisions to the PEIR are warranted.

- 07-9 • **Environmental Justice Issues.** A more thorough analysis of environmental justice issues is required. Restored wetlands would increase access for underserved communities by providing opportunities for recreation, education and research, as well as quality of life benefits. The DEIR needs to include proposals to increase and restore access to the Mission Bay Regional Park. While the Mission Bay Regional Park has 19 miles of sandy beaches, there is no accessible tidal marsh habitat. The Wetlands Optimized Alternative provides equitable access to recreational opportunities that don't exist at all in Mission Bay Regional Park.
- 07-10 • **Value of the California Coast.** The DEIR should include more on the overall value of the California Coast and the strong support of the California Coastal Commission to preserve some natural areas consistent with the California Coastal Act. "The Coastal Act **guides how the land along the coast of California is developed or protected from development. It emphasizes the importance of the public being able to access the coast, and the preservation of sensitive coastal and marine habitat and biodiversity.** It dictates that development be clustered in areas to preserve open space, and that coastal agricultural lands be preserved. It prioritizes coastal recreation as well as commercial and industrial uses that need a waterfront location." The DEIR need to revisit the history and preservation of the California coast with a greater emphasis on preservation of coastal and marine habitat and biodiversity.
- 07-11 • **Amelioration of Sea Rise.** The DEIR is deficient in its analysis of the impacts of climate change and sea rise that will directly impact Mission Bay and the study area. It needs to examine the impact of sea rise on all of Mission Bay including the study area at DeAnza cove. The DEIR fails to examine the benefits of project in creating a large natural habit in De Anza cove to the city's Climate Action Plan. The Wetland Optimized Alternative will provide maximum resiliency as future sea rise occurs. The DEIR should examine the impact of the Rewild plans and the Wetlands Optimized Alternative on mitigating the impact of sea rise.
- 07-12 • **Greenhouse Gas (GHG) reduction.** First and foremost, the natural habit of the project would constitute a climate sink that would absorb carbon and help the city meet its climate action goals. The DEIR states "with implementation of the CAP, the City aims to achieve net zero GHG emissions

07-9: This comment states that a more thorough analysis of environmental justice issues is required and needs to include proposals to increase and restore access to the Mission Bay Park. Environmental justice is not an issue area that is analyzed under CEQA. However, the proposed project would increase access to Mission Bay Park. As discussed in PEIR Chapter 3.0, one of the project objectives is to enhance public access and connectivity within De Anza Cove and increase connections to surrounding communities, including opportunities for multimodal travel. To meet this objective, the project would include active and passive recreational amenities such as sand volleyball, pickleball, tennis, walking, cycling, athletic fields, and inline/roller skating and a sandy beach area at the northern and western edges of De Anza Cove. The project would improve access to park areas along the bay shoreline for residents and visitors. In addition, the project would include a waterfront multi-use path to provide users with shore access and connect to points north, west, and east to enhance public equitable access and increase connections to surrounding communities. The multi-use path would be a feature for users to view the marshes and have distant views of Mission Bay. In addition, areas designated as Regional Parkland would include passive recreation amenities such as overlooks, pathways, and picnic areas. Finally, PEIR Figure 3-1, Site Plan, and PEIR Table 3-2, Proposed Land Use Acreages, have been revised in the Final PEIR to reflect a no net loss of active recreation use acreages compared to the existing condition. No additional revisions to the PEIR are warranted.

07-10: This comment states that the PEIR needs to revisit the history and preservation of the California coast with a

greater emphasis on preservation of coastal and marine habitat and biodiversity. Please refer to response to comment O7-3, which discusses the environmental baseline condition.

As described in PEIR Chapter 3.0, the project would include wetlands enhancement and restoration in City-owned portions of the existing Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP), the area currently occupied by Campland on the Bay (Campland), the eastern side of Rose Creek, and the areas in De Anza Cove currently occupied by the vacated mobile home park and open water. To the west of Rose Creek, the project seeks to implement the vision of the MBPMP by removing Campland and replacing it with habitat contiguous to the existing KFMR/NWP. The project includes habitat restoration and establishment of new habitat for species that would result in a net environmental benefit of expanded wetland habitat. Therefore, the PEIR includes restoration of sensitive coastal and marine habitats that will promote biodiversity.

- O7-11:** This comment states that the PEIR is deficient in its analysis of the impacts of climate change and sea level rise that will directly impact Mission Bay and the project area. In addition, this comment states that the PEIR should examine the impact of the Rewild plans and the Wetlands Optimized Alternative on mitigating the impact of sea level rise. As stated in PEIR Chapter 3.0, the project would expand the project area's natural habitat and improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect the City against the risk of climate change in line

with the City's Climate Resilient SD Plan. A Sea Level Rise Assessment Technical Report has been prepared for the project and the Wetlands Optimized Alternative and has been incorporated into the Final PEIR as Appendix N. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise scenario. Please refer to response to comment O7-4 regarding the analysis of project alternatives.

O7-12: This comment states that the PEIR fails to calculate the carbon absorption effect of the project on greenhouse gas (GHG) amelioration and does not meet the goals of the City's Climate Action Plan (CAP). PEIR Section 5.4, Greenhouse Gas Emissions, analyzes potential impacts related to GHG emissions that could result from implementation of the project. The City adopted an updated qualified CAP in August 2022 that establishes a Citywide goal of net zero by 2035. A qualified CAP is one that meets requirements so that future development projects requiring environmental review under state law can streamline GHG impact analyses by demonstrating consistency with the CAP. Therefore, the project is evaluated for consistency with the City's CAP based on guidance issued by the City for plan-level environmental documents to determine the significance of project GHG emissions.

O7-12
cont.

by 2035.” But the DEIR suggests that the CAP will fall short of its climate goals. The DEIR states: “However, additional reductions would be required to achieve net zero emissions.” Thus, the city should adopt the most extensive plan for rewilding mission bay that absorbs the maximum amount of GHG to assist with the City’s climate action goals. The DEIR suggests the proposed project would produce some short-term greenhouse gas emissions but overall: “The proposed project’s GHG emissions would not have a significant cumulative impact on the environment.” What the DEIR fails to do is to calculate the carbon absorption effect of the project on GHG amelioration. The DEIR needs to remedy this oversight. Moreover, because the Wetlands Optimized Alternative would have more wetlands than the proposed project the DEIR needs to assess the benefits to GHG reduction and the climate action plan from a larger wetland alternative. Gradients of GHG reductions are not fully analyzed in the DEIR. Clearly, a larger wild marsh and upland area, as proposed in the Wetlands Optimized Alternative, would absorb the most GHG and is the Sierra Club’s preferred alternative.

O7-13

The DEIR maintains that the project will produce less GHG than the current conditions. The DEIR states: “GHG emissions attributable to the proposed project at full buildout would be less than GHG emissions under the existing conditions and the adopted MBPMP due to the deintensification of land uses and associated decrease in developed land.” “The project would reduce development and vehicle trips compared to the existing baseline condition and would therefore be consistent with GHG reduction goals.” But the DEIR admits the Wetlands Optimized Alternative is the preferred plan when it states that: “The Wetlands Optimized Alternative would result in fewer vehicle trips than those generated under the proposed project due to a reduction in traffic-generated uses on site and the total VMT would be reduced compared to the proposed project.”

Thus, a revised EIR should reconsider the Wetlands Optimized Alternative as the preferred alternative because it absorbs more GHG and produces less GHG than the proposed project.

Other restoration areas within the City’s jurisdiction are being considered to meet the goals of the City’s CAP. The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 225.1 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City’s CAP. As identified in the City’s CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

O7-13: This comment states that a revised EIR should reconsider the Wetlands Optimized Alternative as the preferred alternative because it absorbs more GHG and produces fewer GHG emissions than the project. A reduction in GHG emissions is not the only environmental consideration for the project. The project would reduce GHG emissions compared to the existing conditions and would not result in a significant impact. Please refer to response to comment O7-3 regarding the analysis of the Wetlands Optimized Alternative.

O7-14

- **Cumulative Benefits to Rose Creek Watershed.** Although the DEIR mentions Rose Creek dozens of times, it fails to assess the benefits of restored wetlands to the Rose Creek ecosystem which is a tributary of Mission Bay and is located in the very heart of the proposed wetlands. Since water quality improvement is the main goal of the Mission Bay Park Master Plan for this area, water quality impairment of Rose Creek needs to be addressed. A restored marsh could reduce or eliminate the eutrophication of the area that is mentioned in the DEIR. This analysis of the positive impact of a project to surrounding ecosystems is required under the California Environmental Quality Act.

O7-15

The Sierra Club applauds the City of San Diego in making great strides toward the preservation and restoration of Mission Bay. That said, the aforementioned deficiencies in the EIR need to be remedied and the conclusion of the EIR should reconsider the Wetlands Optimized Alternative as the preferred alternative.

Dr. Peter Andersen, Vice Chairperson
Sierra Club San Diego Conservation Committee

Dr. Ron Askeland, Chairperson
Sierra Club San Diego Conservation Committee

O7-14: This comment states that the PEIR fails to assess the benefits of restored wetlands to the Rose Creek ecosystem and that the water quality impairment of Rose Creek needs to be addressed.

The City agrees that increasing wetlands would enhance water quality; however, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." As discussed in PEIR Chapter 3.0, the project would include wetlands enhancement and restoration in City-owned portions of the existing KFMR/NWP, the area currently occupied by Campland, the eastern side of Rose Creek, and the areas in De Anza Cove currently occupied by the vacated mobile home park and open water. To the west of Rose Creek, the project seeks to implement the vision of the MBPMP by removing Campland and replacing it with habitat contiguous to the existing KFMR/NWP. The project objectives include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. The project's wetland restoration component would improve water quality. The project would expand the project area's natural habitat and improve water quality through the creation of additional wetlands. The benefits of the project will be included in the Statement of Overriding Considerations for the project, which will identify how the project's environmental, social, and technical benefits outweigh the adverse impacts.

PEIR Section 2.3.7, Hydrology and Water Quality, identifies several portions within Mission Bay and its shorelines that are listed on the 2020–2022 California Integrated Report for impairments (Clean Water Act Section 303(d) List/305(b) Report). Portions of the bay listed for impairments are provided in Table 2-9, Clean Water Act 303(d) List for Regional Board 9 – San Diego Region. PEIR Section 4.7, Hydrology and Water Quality, concludes that the project would have the potential to result in long-term operational pollutants associated with components of the project, such as low-cost visitor guest accommodations, parking areas, and street improvements, that would introduce potential pollutants, including sediments, heavy metals, nutrients, trash and debris, oxygen-demanding substances, oil and grease, pesticides, and bacteria and viruses, due to the project’s location within and adjacent to Rose Creek and Mission Bay. However, in accordance with the City’s Stormwater Standards Manual, the project is a priority development project that is required to incorporate post-construction (or permanent) Low Impact Development site design, source control, and treatment control best management practices into the project’s design. The types of best management practices that could be implemented are listed in PEIR Table 5.7-1, Recommended Best Management Practices. The best management practices are preliminary recommendations and would be refined and implemented as part of final project design and monitoring programs for future project activities consistent with the project in accordance with the City’s Stormwater Standards Manual that requires the preparation of a Stormwater Quality Management Plan. The Stormwater Quality Management Plan must accompany the final design of subsequent

project activities to ensure that runoff generated by the project is adequately captured/treated per applicable federal, state, and local regulations.

In addition, the project proposes water quality design features along the edges of active recreation areas. Proposed water quality detention basins would be different sizes and would capture and treat stormwater before it flows into Mission Bay. New water quality detention basins would be located to treat the entire project area in accordance with local and state requirements. Water quality detention basins would be designed with a sediment forebay, a height-appropriate embankment specific for each area of treatment, and a base to reduce sediment and erosion at the outflow. Native plants would be used to reduce sediment and total suspended solids from stormwater. Additional water quality-enhancing features would include vegetated areas bordering all development to reduce stormwater contamination, including debris and sediment, from reaching Mission Bay.

In addition, revegetating the edges of Rose Creek and along the “boot” of De Anza Cove with marsh, wetland, and upland native plants would create another water quality-enhancing feature. “Green” infrastructure such as constructed oyster beds could be implemented at shorelines where oyster colonization is feasible. Because oysters feed by filtering algae from the water, they function as a natural filter and improve water overloaded with nutrients. No revisions to the PEIR are warranted.

07-15: This comment is a closing comment. It does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is warranted.

Comment Letter O8: Friends of Rose Canyon, April 19, 2023

O8

From: [Deborah Knight](#)
To: [E.N. Planning/CEQA](#)
Subject: [EXTERNAL] DeAnza Natural Amendment to the Mission Bay Park Master Plan Draft PEIR comments
Date: Wednesday, April 19, 2023 10:58:38 PM
Attachments: [DEIR Comments-De Anza Natural Amendment.pdf](#)
[RoseCreek Watershed Map.pdf](#)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Attached are:

- Comments on the Draft PEIR for the De Anza Natural Amendment to the Mission Bay Park Master Plan
- As part of the comments, a map of the Rose Creek Watershed

Sincerely,

Deborah Knight
Executive Director
Friends of Rose Canyon
858-525-1489 - cell
m

O8-1: This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

O8-1

The mission of Friends of Rose Canyon is to protect, preserve and restore
Rose Canyon and the Rose Creek watershed.

April 19, 2023

Comment on the Draft PEIR for the De Anza Natural Amendment to the Mission Bay Park Master Plan

Attachment: Map of the Rose Creek Watershed (the area that drains into Mission Bay near De Anza Cove)

O8-2	<p>The city's draft EIR must prioritize water quality in Mission Bay by adding a specific project objective to "improve the water quality of the study area and the bay through natural, resilient infrastructure." The 1994 Mission Bay Park Master Plan demands it.</p>
O8-3	<p>Prioritizing water quality is particularly important because the primary fresh water tributary of Mission Bay is Rose Creek, which enters Mission Bay near De Anza Cove. Rose Creek receives all the storm water run-off from the Rose Creek watershed, which includes a large, highly urbanized area.</p> <p>The Rose Creek watershed consists of two branches:</p> <ul style="list-style-type: none"> • Rose Creek, which flows across MCAS Miramar and through Rose Canyon • San Clemente Creek, which flows across MCAS Miramar and through San Clemente Canyon (Marian Bear Park) • Just south of the I-5/SR-52 intersection, San Clemente Creek enters Rose Creek, which continues to flow south to become the main fresh water tributary of Mission Bay. <p>Both Rose Creek and San Clemente Creek receive huge inflows of untreated storm water run-off from many miles of highway (I-5, I-805, and SR-52), all the major roads and neighborhood streets, large expanses of parking lots, and intense residential, commercial and institutional development that covers a large urbanized area, including:</p> <ul style="list-style-type: none"> • much of the University Community Plan area (from Eastgate Mall south to SR-52) • much of North Clairemont, some of which drains into San Clemente Creek along SR-52 and some of which drains into Rose Creek as it flows south to Mission Bay
O8-4	<p>In addition:</p> <ul style="list-style-type: none"> • The draft EIR is missing details on foreseeable impacts from sea level rise. How can we, the city, or anyone be expected to determine the best land-use plan without knowing how climate change will affect our park?
O8-5	<ul style="list-style-type: none"> • The city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035. The Wildest plan provides the city with one of the best ways to achieve this goal, but the draft EIR for the De

O8-2: This comment recommends that the PEIR include a specific project objective that prioritizes improving water quality through natural resilient infrastructure. The project objectives listed in PEIR Chapter 3.0, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Section 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

O8-3: This comment summarizes the Rose Creek Watershed. As discussed in PEIR Chapter 2.0, Environmental Setting, Rose Creek is the primary source of fresh water to the project area, with most freshwater inflow occurring during the winter and spring months, when the San Diego region typically receives most of its precipitation. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR for the project. Therefore, no further response is warranted.

O8-4: This comment states that the PEIR is missing details on the foreseeable impacts from sea level rise. A project-specific Sea Level Rise Assessment Technical Report was prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for

the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise scenario.

O8-5: The comment states that the PEIR fails to consider the ReWild Mission Bay “Wildest” proposal in relation to the City’s Climate Action Plan (CAP) restoration goal of 700 acres of restored tidal marsh by 2035. Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. PEIR Chapter 8.0 evaluates four alternatives that were selected for additional analysis. In addition, PEIR Chapter 8.0 also identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the ReWild Mission Bay “Wildest” proposal, is provided in PEIR Chapter 8.0.

Other restoration areas within the City’s jurisdiction are being considered to meet the goals of the City’s CAP. The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 225.1 acres of wetlands in the Mission Bay Park.

O8-5
cont.

Anza Natural plan fails to evaluate its proposals against the city's own Climate Action Plan goals.

O8-6

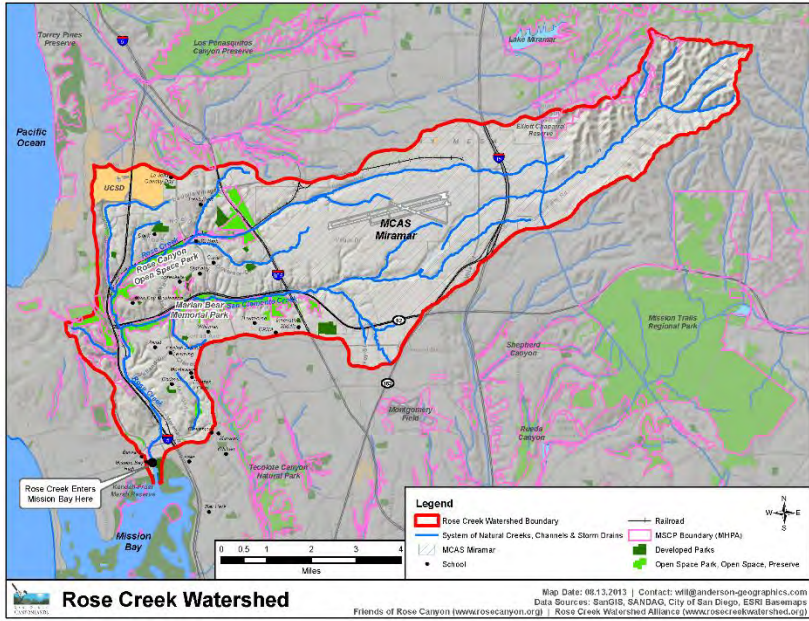
- The city's proposal fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. All San Diegans, including our Kumeyaay neighbors and those in underserved communities, will benefit with access to a vibrant tidal marsh.

Sincerely,

Deborah Knight
Executive Director

The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing communities of concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

O8-6: This comment states that the PEIR fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem and that all San Diegans will benefit from access to a vibrant tidal marsh. The City concurs that access to a restored tidal wetland would be a benefit to all San Diegans, including members of local Tribal nations, and the project would include an Interpretive Nature Center which would foster opportunities for members of local Tribal nations to reconnect to De Anza Cove in line with Project Objective 2. However, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." No revisions to the PEIR are warranted.



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Comment Letter O9: J. Whalen Associates, Inc., on behalf of San Diego Mission Bay Boat and Ski Club, April 19, 2023

O9

From: [James Whalen](#)
To: [PLN_PlanningCEQA](#)
Cc: [Rosalee Redink](#)
Subject: [EXTERNAL] Comment Letter on De Anza Natural PEIR
Date: Wednesday, April 19, 2023 11:48:38 AM
Attachments: [Comments on De Anza Natural Draft Program EIR JWA 4_19_23.pdf](#)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

O9-1: This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

O9-1

Dear Mr. Moore, here are the comments of the San Diego Mission Bay Boat & Ski Club on the De Anza Natural Plan Program EIR. Please let us know if you have any questions and we look forward to a mutually acceptable solution to the identified problem. Thanks, Jim Whalen

James E. Whalen
President
J.Whalen Associates, Inc.
2851 Camino del Rio South, Suite 200
San Diego, CA 92108
619-683-5544
www.jwhalen.net

April 19, 2023

CEQA Section
City of San Diego
202 C Street
San Diego, CA 92101

Re: Comments on De Anza Natural Draft Program Environmental Impact Report
SCH #2018061024

To Whom This Concerns:

3387 Camino Del Rio North
Suite 1600, Dept. 6
San Diego, California
92108
619.683.8574
619.683.8525 FAX
www.jwhalen.net

O9-2

O9-3

O9-4

This firm represents the San Diego Mission Bay Boat & Ski Club (Club), which is gravely concerned that the well-intentioned De Anza Natural Plan as drafted will unnecessarily spell the end of an 80-year-old San Diego institution. The Club dates back to its original home on San Diego Bay and from there to Mission Bay where it has been since 1963 in a historic tiki-style clubhouse. The Club is the last bastion of the days when San Diego wasn't such an expensive place to enjoy its natural resources.

The San Diego Mission Bay Boat & Ski Club is a 300 local family-member, *non-profit* organization that promotes Mission Bay as an active recreational center for all to enjoy, especially those of working-class means. While the Club commends the City's efforts in moving forward with plans to reestablish lost wetlands at De Anza Cove, it was disheartening to see the Club summarily eliminated from the De Anza Natural Plan as evidenced by the proposed land use map in the NOP and Draft EIR. However, a simple commitment to a phasing and funding compromise solves the problem that the flawed EIR nonetheless spotlights.

For background, the Club has operated in San Diego since 1940 and provides low-cost recreation amenities for San Diego residents and visitors, inclusive of all races, ages, genders, sexual orientations or disabilities. The Club takes up only a small footprint (please see attached aerial photo) within the greater De Anza Cove area but would be forced to close if the De Anza Natural plan is approved without mitigation of the Club's displacement.

While the De Anza Natural Plan touts increased opportunities for recreational enjoyment, if the De Anza Plan proceeds as intended, the Club, which is the premier provider of Mission Bay recreation for the broadest group of stakeholders, would be removed, forcing the end of the recreational programs and clinics the Club has provided for decades. This would run counter to the Project Objectives of the Mission Bay Master Plan (i.e. Land Use Goal 1, Water Use Goal 1, Water Use Goal 4, Economic Goal 1, Economic Goal 2, and Economic Goal 3), and also the De Anza Natural Project Objective #5, which urges that the Project "Diversify active and passive recreational uses that will serve a range of interests, ages, activity levels,

O9-2: This comment describes the history of the San Diego Mission Bay Boat and Ski Club (Club). The City appreciates the Club's participation in the review of the PEIR for the project. This comment summarizes the history of the Club and expresses concern that the Club was eliminated from the project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

O9-3: This comment provides a background of the Club and does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O9-4: This comment states that closing the Club would be inconsistent with the Mission Bay Park Master Plan (MBPMP) goals and the PEIR project objectives. As discussed in PEIR Chapter 3.0, Project Description, the project would enhance the existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations, active and passive recreational opportunities to enhance public use of the area, and improvements to access to recreational uses. Furthermore, PEIR Chapter 3.0 states that a boat facility and shared clubhouse would be sited on the northern shore of De Anza Cove with approximately 1 acre of water use for non-motorized boats, an Interpretive Nature Center, and shared parking/service infrastructure as identified on PEIR Figure 3-1, Site Plan. The project seeks to implement the recommendations of the MBPMP. PEIR Appendix B, Land Use Consistency Tables, includes a consistency analysis and determined that the project would be consistent with the goals of the MBPMP. No further revisions to the PEIR are warranted.

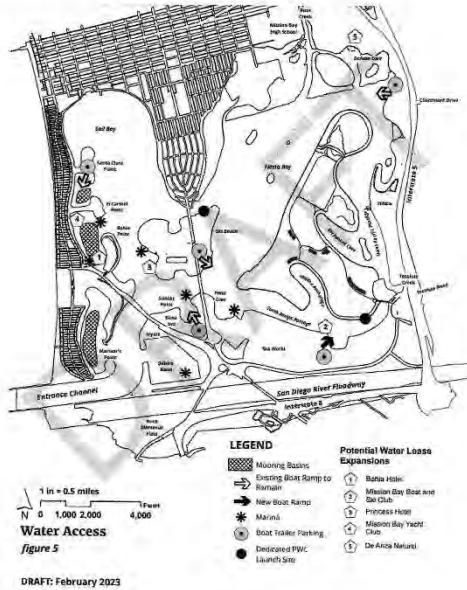
O9-4
cont.

incomes both on land and in water". Closing the Club is inconsistent with all of the foregoing Project Objectives and also the Mission Bay Master Plan, which anticipates moving the Club to South Shores.

Here are our comments on the draft Program EIR:

- 1) Relocation isn't currently a feasible alternative—while a new site in South Shores Park would be suitable, no work has been done to ready the site, including such fundamental steps as land surveying, biological resource mapping, environmental analysis, and site planning. The South Shores General Development Plan also needs updating. It also may be that the landfill that underlies the future site may render the property unsafe due to the presence of hazardous materials. For this reason, the PEIR needs to correct the misconception that the Club can simply vacate its current site and move.

Deferring analysis can be acceptable in a Program EIR, but not if it leaves the impression to the reader that a solution is feasible when it isn't. There is no place for the Club to move today, nor has funding been identified to accomplish the permitting and construction of new Club facilities. Please see Figure 5 *Water Access* from the De Anza Natural Plan below for the proposed relocation site, marked as the second of a list of Potential Water Lease Expansions.



O9-5

O9-5: This comment states that relocation of the Club is not an option and that no fundamental steps such as biological resource mapping, environmental analysis, and site planning have occurred. As explained in the PEIR, California Environmental Quality Act (CEQA) Guidelines, Section 15168(a) states that "A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) Geographically, (2) As logical parts in the chain of contemplated actions, (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

CEQA Guidelines, Section 15146, defines the degree of specificity necessary in an EIR: "The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." Therefore, an EIR for a project such as the adoption of a Master Plan Amendment should focus on the secondary effects that can be expected to follow from the adoption or Amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow. Therefore, the PEIR does not serve as a project-level environmental analysis for any specific development project, and adequate information is not available at this time to address potential future site-specific impacts of the project.

Furthermore, the PEIR acknowledges that the City will evaluate future detailed General Development Plans (GDPs) for future projects as they are developed. A GDP, as defined

in City Council Policy 600-33, is a Conceptual Master Plan that identifies the specific activities and amenities to be included within a park. As described in PEIR Section 1.4.1, Type of PEIR, GDPs will be developed over time and will provide precise engineering and construction plans for the recreational elements of the project. Once the project design has been completed, prior to approval, the City will route the future project through the Public Project Assessment process, which includes the preparation of the appropriate environmental documentation in accordance with CEQA. At that time specific mitigation measures will be developed based the site-specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. At this point, public and agency comments will be invited to address the site-specific impacts identified in the future CEQA documentation. No revisions to the PEIR are warranted.

- 09-6 2) The PEIR misstates the activities on the Club property in the statement in the Historical Resources Constraints Analysis Memorandum for the PEIR, dated March 12, 2019. Stating that the Club area is currently used as a "boat storage facility", coupled with language in the Memorandum that implies Club activities are a thing of the 1970's past, makes the reader think the Club is inactive today when nothing could be further from the truth. Boats are obviously going to be stored there because they need to be launched into water. Just as important, the storage of the boats provides revenue needed to fund the programs of Club Partners, which include:
- a. Blind Community Center of San Diego
 - b. San Diego Center for the Blind
 - c. Braille Institute San Diego
 - d. San Diego Lifeguards
 - e. Southern California Outrigger Racing Association
 - f. San Diego's Pacific Islander community
 - g. Ikuua Koa Outrigger Paddling Club
 - h. Kai Elua Outrigger Paddling Club
 - i. San Diego State's Concrete Canoe Team
 - j. San Diego Audubon Society and the Kumeyaay tule boat program
 - k. Friends of Rose Creek
 - l. Pacific Beach Town Council
 - m. Dana Landing
 - n. San Diego Associations of Yacht Clubs
 - o. Sailors for the Sea
 - p. Convair Water Ski Team
 - q. United San Diego Water Ski Team
 - r. University of San Diego Water Ski Team
 - s. Golden State Flycasters
 - t. US Coast Guard Auxiliary
 - u. California Division of Boating & Waterways (DBW)
 - v. Old Mission Beach Athletic Club (OMBAC)
- 09-7 These programs do not have another location, and their loss would be an unmitigated significant impact with the proposed Plan. The section of the De Anza Natural Plan on Historical, Archeological, and Tribal Cultural Resources correctly states that the project could result in the alteration of a prehistoric or historic building, object, structure, or site, but then unacceptably states that no mitigation measures are proposed when in fact there are feasible measures that can solve the problem. Why would the City wish to make CEQA Findings and Overriding Considerations for Historical, Archeological, and Tribal Cultural Resources, the only project impacts that have not been reduced to Less than Significant when a compromise on phasing and funding support solves the problem?
- 09-8 3) The question of inverse condemnation or relocation expense liability is not addressed in the PEIR. The government may argue it has no duty due to the month-to-month lease structure, but relocating to a new location cannot come at the expense of an 80-year-old financially successful operation. Inverse condemnation occurs when the government takes private property for public

09-6: This comment states that the Historical Resources Constraints Technical Memorandum (PEIR Appendix H) describes the Club as inactive. PEIR Chapter 2.0, Environmental Setting, identifies and describes the existing land uses in the project area. Specifically, the PEIR states that the northern portion of the project area currently contains active recreational facilities, including the Mission Bay Boat and Ski Club. This area is identified as more than a "boat storage facility," and the City acknowledges the various current activities of the Club. No revisions to the PEIR are warranted.

09-7: This comment states that the loss of the Club would result in an unmitigated significant impact. The comment further states that the PEIR correctly acknowledged that the loss of the Club would result in the alteration of historical structure but does not agree that no feasible mitigation measures exist. As stated in PEIR Section 5.6, Historical, Archeological, and Tribal Cultural Resources, implementation of the project could result in the alteration of a historic building, structure, object, or site, and impacts would be potentially significant. The PEIR concludes that, even after the application of the existing regulatory framework in the City's Historical Resources Guidelines and Historical Resources regulations, the degree of future impacts and the applicability, feasibility, and success of future avoidance measures cannot be adequately known for each specific future project at the program level of analysis. Thus, potential impacts to historic buildings, structures, objects, and/or sites would be significant and unavoidable. Therefore, the impact is adequately addressed in the PEIR. Please refer to response to comment 09-5 regarding the environmental analysis required for a PEIR. No revisions to the PEIR are warranted.

O9-8: This comment states that inverse condemnation or relocation expense liability is not addressed in the PEIR. California Environmental Quality Act (CEQA) Guidelines, Section 15131, specifically states that “economic or social effects of a project shall not be treated as significant effects on the environment.” CEQA defines “environment” as “the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance” (California Public Resources Code, Section 21060.5). An EIR project analysis is limited to those socioeconomic issues that could result in a direct change to the physical environment. As a result, the relocation expense liability of the project is not considered an environmental issue and is not required to be analyzed in the PEIR. No revisions to the PEIR are warranted.

O9-8
cont.

use without just compensation or by imposing regulations that deprive a property owner of all economically viable use of their property.

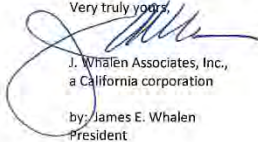
In the context of a tenant being forced to vacate premises by government action, inverse condemnation may come into play if the government action results in the property owner being deprived of all economically viable use of their property. Here, the City is proposing to force the Boat & Ski Club to vacate in order to build a public park, and the City proposes that the property owner not be compensated for the loss of income or to the value of the Club's property. In this case, the property owner may have a claim. It is straightforward that since the Club is being threatened with removal, the City's blithe action will result in the taking of their property without just compensation.

While courts have recently found in *California Cartage Company vs. City of Los Angeles* that terminating a short-term lease does not constitute a taking for purposes of eminent domain law, the circumstances are different when it comes to a claim for relocation expenses. In the relocation context, a different set of regulations apply that do not necessarily require a taking of private property. There is a reasonable argument that the standard for qualifying for relocation benefits as a displacee is lower than the standard for proving a taking for inverse condemnation liability.

O9-9

In conclusion, rather than urging the adoption of the No Project Alternative, the only PEIR alternative that keeps the Club operating, a compromise is proposed. We hope you will work with the San Diego Mission Bay Boat & Ski Club to keep them operating by *phasing the wetlands restoration* so the Club would remain its current location until the new site in South Shores Park is permitted and built. In this way, the Club can continue to serve the San Diego community while the De Anza Natural plan is being realized.

Very truly yours,



J. Whalen Associates, Inc.,
a California corporation
by: James E. Whalen
President

Attachment:

cc: San Diego Mission Bay Boat & Ski Club
Alexander Llierandi (California Coastal Commission)
Brian Elliott (Office of Councilmember La Cava)

O9-9: This comment requests that the Club stay in its current location until the new site in South Shores Park is permitted and built. Please refer to response to comment O9-5. The City will strive to design and phase development of future facilities in a manner that minimizes disruption to existing recreational facilities. Any necessary buffer zones and other land uses proposed on existing recreational facilities would be implemented after these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. In addition, this is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. No further response is warranted.

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Comment Letter O10: Professional Golfers' Association of America, Southern California Section, April 19, 2023

O10

O10-1: This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

From: [Matt Rogers](#)
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] Comments on the proposed amendments to the Mission Bay Park Master Plan
Date: Wednesday, April 19, 2023 7:11:34 PM
Attachments: [SCPGA Comments on Mission Bay.pdf](#)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Good evening,

Please accept the attached document which includes our organization's comments regarding the proposed amendments to the Mission Bay Park master plan. Also, please reply to confirm receipt of this email. Thank you.

Matt Rogers

Public Affairs Manager

Southern California PGA

3333 Concoours Street Bldg. 2, Ste. 2100

Ontario, CA 91764

Mobile: 661.388.6692



O10-1



April 19, 2023

Ms. Rebecca Malone
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123

Via E-Mail: planningceqa@sandiego.gov

Subject: De Anza Natural Amendment to the Mission Bay Park Master Plan (Amendment to the Mission Bay Park Master Plan) SCH No: 2018061024

Dear Ms. Malone:

The Southern California PGA (SCPGA) is a membership organization comprised of 1,700 professional golfers who work at roughly 500 facilities that stretch from the middle of the state to the Mexican border and from the Pacific Ocean to the borders of Nevada and Arizona. SCPGA's mission is the promotion of the game and industry of golf in general and the interests of our PGA golf professionals in specific. The following comments are submitted on behalf of both – the game and SCPGA's members.

Regarding the subject amendment, the Southern California PGA Section implores the City of San Diego to stay the course it long ago set to keep the facility fully intact – that is, a par 58 executive golf course with an ample driving range including practice/developmental short game/junior golf component. Reducing the facility to a 3-par without driving range would be an expensive proposition that would waste the \$11 million the Parks Department has already spent improving the existing facility – \$11 million derived from the greens fees remitted by the patrons of Torrey Pines and deposited into the city's golf enterprise fund.

The Mission Bay Golf Course is a valuable asset to the San Diego Golf Division. As a par-58, executive style course, it attracts golfers from all levels of playing ability from young to old and novice to expert. Over the span of its 66 years in existence, the course has played host to over 60,000 rounds per year. Last year, that number reached 102,000 rounds. Overall, golf play is up 22% since 2019, according to National Golf Foundation. The considerable jump is due to the flexibility of remote work during the COVID-era and the exponential increase in the popularity of the game. An advantage for golf courses who keep their tee sheets filled but a disadvantage for the golfer who has historically leaned on the affordability and playability of a municipal golf course such as Mission Bay.

O10-2

O10-3

O10-4

O10-2: This comment describes the Southern California Professional Golfers' Association of America (SCPGA) organization. The City of San Diego (City) appreciates the SCPGA's participation in the review of the PEIR for the project. This comment summarizes SCPGA's mission and does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O10-3: This comment encourages the City to keep the Mission Bay Golf Course fully intact. In response to this comment and others, PEIR Figure 3-1, Site Plan, and PEIR Table 3-2, Proposed Land Use Acreages, have been revised in the Final PEIR to ensure no net loss of active recreation use acreage, including the area occupied by the Mission Bay Golf Course. In addition, the City will strive to plan for future facilities with design and phased development in a manner that minimizes disruption to active recreation access. Any necessary buffer zones and other land uses proposed on existing recreation facilities would be implemented after these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. The existing uses, including the Mission Bay Golf Course, form the baseline from which the PEIR evaluates the impacts of the project at the program level. Improvements to current facilities may be implemented as future projects come forward. Future projects will be subject to the City's General Development Plan process to ensure that all requirements are met before they are approved.



PGA

Southern California Section

O10-4
cont.

At the SCPGA, our membership is filled with professional golfers who manage the daily operations at golf facilities. PGA golf professionals, particularly those who labor at developmental municipal facilities like Mission Bay, demonstrate a passion for community engagement equal if not greater than the passion demonstrated by those who labor to bring sports such as soccer or baseball to those same communities.

O10-5

Golf courses provide benefits well beyond the obvious – i.e., jobs, revenue, multiplier economic impacts, recreation, and community engagement. They provide environmental value as well. They sequester carbon, provide habitat, allow rainwater to get into groundwater basins, mitigate flooding during heavy storm periods (as we have recently experienced), and function as fire breaks during the state’s increasingly long dry seasons. Mission Bay Golf Course is very much consistent with the environmental aspirations embedded in the overall De Anza Revitalization Plan/effort.

O10-6

On behalf of Southern California’s golf professionals, particularly those who live and work in California’s 2nd largest city San Diego, allow me to thank you for considering our Association’s comments on this subject.

Respectfully submitted,

Nikki Gatch
Nikki Gatch, PGA
Executive Director/CEO

O10-4: This comment states that the Mission Bay Golf Course is a valuable asset to the San Diego Golf Division. In addition, the comment states that the PGA professional golfers demonstrate a passion for community engagement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

O10-5: This comment summarizes environmental benefits of golf properties. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

O10-6: This is a closing comment that requests consideration of the aforementioned comments. It does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

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Comment Letter O11: San Diego District Tennis Association, April 19, 2023

O11

From: John Broderick
To: Sandel, Scott; CouncilMember Joe LaCava
Subject: [EXTERNAL] Save Pacific Beach Tennis Club
Date: Wednesday, April 19, 2023 1:53:33 PM
Attachments: new-usta-foo0_5CTA_SD-H-bj w skyline.jpg

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Hello Mr. Sandel & Mr. LaCava,

My name is John Broderick and I serve as President of the San Diego District Tennis Association (SDDTA) which operates as the local affiliate for the United States Tennis Association (USTA).

O11-1

The Pacific Beach Tennis Club is considered a significant and valued tennis facility within the greater San Diego County tennis community. Over the past several decades, our tennis community has lost over 100 courts in the San Diego area mostly due to the increasing cost of real estate. Tennis has been growing the past several years at close to 30% and the waiting lists and demand for tennis courts is at an all time high.

O11-2

This weekend the Pacific Beach Open Tennis Tournament plays host to 246 participants in the first USTA sanctioned adult tournament of spring in San Diego County. One thing we know for certain from past history is; once the tennis courts are taken away they will never be replaced. The entire community of Pacific Beach and surrounding areas would no longer have access to public tennis courts. Not to mention the large number of USTA league teams and guests who take advantage of the courts from around the county and country while traveling to San Diego. PB Tennis Club has been a vital part of the tennis ecosystem for over 60 years and eliminating the club would have a profound negative impact on the San Diego tennis community as a whole.

O11-3

Please consider the impact the destruction of this tennis club or any part thereof would mean to the tennis community and Pacific Beach.

The SDDTA would greatly appreciate your efforts and support in this matter.

Warmest regards,

O11-1: This comment provides an introduction to the comment letter and describes the Pacific Beach Tennis Club. The City of San Diego (City) appreciates the San Diego District Tennis Association's participation in the review of the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O11-2: This comment summarizes activity at the Pacific Beach Tennis Club and states that eliminating the facility would have a negative impact on the San Diego tennis community. In response to this comment and others, PEIR Figure 3-1, Site Plan, and PEIR Table 3-2, Proposed Land Use Acreages, have been revised in the Final PEIR to ensure no net loss of active recreation use acreage, including the acreage occupied by the Pacific Beach Tennis Club. In addition, the City will strive to plan for future facilities with design and phased development in a manner that minimizes disruption to active recreation access. Any necessary buffer zones and other land uses proposed for existing recreation facilities would be implemented after these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. The existing uses, including Pacific Beach Tennis Club, form the baseline from which the PEIR evaluates the impacts of the project



at the program level. Improvements to current facilities may be implemented as future projects come forward. Future projects will be subject to the City's General Development Plan (GDP) process to ensure that all requirements are met before they are approved. A GDP, as defined in City Council Policy 600-33, is a Conceptual Master Plan that identifies the activities and amenities to be included in a park. As described in PEIR Section 1.4.1, Type of PEIR, GDPs will be developed over time and will provide precise engineering and construction plans for the various recreational elements of the project. Since these plans are currently not available at the planning level, their environmental impacts have been estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements. City Council Policy 600-33 also outlines the public participation process for the development of future GDPs. A public workshop is required to provide details of the project, including the proposed scope, schedule, cost, and related information, and would discuss the necessary steps for project review and approval. Once the project design has been finalized and prior to approval, the City will route the project through the Public Project Assessment process, including the preparation of the appropriate environmental documentation in accordance with CEQA. No revisions to the PEIR are warranted.

O11-3: This is a closing comment that supports for the aforementioned comments. It does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is required.

Comment Letter O12: San Diego Mission Bay Boat and Ski Club Board of Directors, April 19, 2023

O12

From: 1st Vice Commodore Brian
To: PLI_PlanningC100; James Whalen
Subject: [EXTERNAL] Fwd: Comments to De Anza Natural Plan PEIR from the San Diego Mission Bay Boat & Ski Club
Date: Wednesday, April 19, 2023 5:29:59 PM
Attachments: SDMBSC comment letter 19 Apr.pdf
SDMBSC Board presentation Apr 2023 #1.pdf
online petition signatures.pdf
signed letter resolution compressed.pdf
Comments on De Anza Natural Draft Program EIR_DWA 4 19 23-compressed.pdf

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

correction to email address.

----- Forwarded message -----

From: 1st Vice Commodore Brian <1stvicecommodore@sdmbbssc.org>
Date: Wed, Apr 19, 2023 at 3:52 PM
Subject: Comments to De Anza Natural Plan PEIR from the San Diego Mission Bay Boat & Ski Club
To: <PlanningC100@sandiego.org>
Cc: Entire SDMBBSC Board <heard@sdmbbssc.org>; James Whalen <james@jwhalen.net>

Folks,
We would like to thank the City for the opportunity to make the attached comments to the De Anza Natural Plan PEIR. We are grateful for the opportunity.

- Please find attached:
1. A letter with our comments
 2. An overview of our Club, its programs and partnerships
 3. Over 1000 on-line signatures from our members, friends and visitors supporting our club and opposing the current De Anza Natural Plan as written. see on-line petition here: https://www.change.org/p/1st-vice-the-boat-club?utm_source=share_petition&utm_medium=custom_url&recruited_by_id=20dfe436-4b59-11e3-a789-01e5b19085f
 4. Over 300 paper signatures from the same and opposing the current De Anza Natural Program as written
 5. A letter with comments on behalf of our club from our land use consultant firm, Jim Whalen Associates, Inc.

We would be happy to provide any additional information and answer any questions.

Sincerely,
Brian Niznik
on behalf of the Board of Directors of the San Diego Mission Bay Boat & Ski Club

O12-1: This comment provides an introduction to the comment letter and states what is enclosed in the comment letter. The City of San Diego (City) appreciates the San Diego Mission Bay Boat and Ski Club (Club) Board of Directors' participation in the review of the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

O12-1

19 April 2023

CEQA Section
City of San Diego
202 C Street
San Diego, CA 92101



To whom this concerns:

O12-2 We are writing to say we are extremely disheartened to see the San Diego Mission Bay Boat & Ski Club removed from the De Anza Natural Plan as evidenced by the latest planning documents. We strongly urge the preservation of the San Diego Mission Bay Boat & Ski Club (the "Club") in the City's plans as planning efforts such as the EIR move forward. The Club is a one-of-a-kind organization providing affordable water-related recreational programs and educational programs which have been serving our local communities for decades. Eliminating this Club would be doing a significant disservice to our community as well as the broader San Diego region by negatively affecting many groups including those identified below.

O12-3 The San Diego Mission Bay Boat & Ski Club has operated in San Diego since 1940 and provides affordable educational program and recreational amenities for San Diego residents and visitors, inclusive of all races, ages, genders, sexual orientations and disabilities. The Club takes up only a small footprint in the greater De Anza Cove area (north of the foot bridge) and would be forced to close if the current version of De Anza Natural plan is approved. While the plan touts increased opportunities for recreational enjoyment, the San Diego Mission Bay Boat & Ski Club would be removed, forcing the thousands of people from very diverse groups it serves out of the recreational programs the Club has provided for decades. This runs counter to the 2018 Notice of Preparation and the objectives of the Mission Bay Master Plan.

O12-4 The Club prides itself on serving residents as well as its partnerships with many organizations in San Diego including but not limited to:

- O12-5
- San Diego Foundation & San Diego Unified School District
 - Ocean Connectors
 - Blind Community Center of San Diego
 - ① San Diego Center for the Blind
 - Braille Institute San Diego
 - Southern California Outrigger Racing Association
 - San Diego's Pacific Islander community
 - Ikuua Koa Outrigger Paddling Club
 - Kumeyaay Community College
 - San Diego State's Concrete Canoe Team
 - ① UCSD's Concrete Canoe Team
 - Pacific Beach Town Council
 - Old Mission Beach Athletic Club (OMBAC)

O12-2: This comment states the Club's dissatisfaction about being removed from the project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

O12-3: This comment provides background on the Club and does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR.

O12-4: This comment states that the Club would be forced to close if the project is approved, which is counter to the 2018 Notice of Preparation (NOP). As discussed in PEIR Chapter 1.0, Introduction, in June 2018, the City initiated a Draft PEIR (2018 Draft PEIR) process for the Mission Bay Park Master Plan (MBPMP) and released the NOP. Preliminary analyses were performed based on the 2018 proposed land use plan (2018 Proposal); however, the 2018 Draft PEIR was never circulated for public review. Based on feedback on the MBPMP since the original 2018 NOP was released, the City modified the project in 2022 to fine tune the land uses and increase preservation of natural resources. An NOP was circulated for the project on January 11, 2022.

Furthermore, as discussed in PEIR Chapter 3.0, Project Description, the project would enhance existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations, active and passive recreational opportunities to enhance public use of the area, and improvements to access to recreational uses. Furthermore, PEIR Chapter 3.0 states that a boat facility and shared clubhouse would be sited on the northern

- Sailors for the Sea
- Convair Water Ski Team
- United San Diego Water Ski Team
- University of San Diego Water Ski Team
- Golden State Flycasters
- US Coast Guard Auxiliary
- California Division of Boating & Waterways (DBW)

O12-5
cont.

With these partnerships and others, the Club is expanding the opportunities for our regional, cultural and educational programs. It aims to foster a healthy Mission Bay for all. For instance, last year the Club received a grant from the San Diego Foundation to implement a program called the Youth Nature Kayak Program which brought elementary school children to the water for the first time where they learned about the history of Rose Creek, native plants and animals. They also learned about boat safety and actively kayaked along the Creek. This is precisely the type of environmental education and water recreation we feel is critical for our community and Mission Bay.

We urge you to work with the San Diego Mission Bay Boat & Ski Club and include the Club in the De Anza Natural Plan and allow us to continue providing our important programs.

O12-6

For a deeper understanding of our Club, its many partner groups and many programs as well as evidence of 1300+ signatures supporting our Club and opposing the current version of the De Anza Natural Plan, please find the following attachments:

1. SDMBBSC Overview Presentation
2. On-line Petition Signatures File
3. Paper Signatures file
4. Copy of the letter and comments from our land use consultant, Jim Whalen

Thank you very much for your consideration.

Sincerely,



Brian Niznik

1st Vice Commodore

Representing the Board of Directors of the San Diego Mission Bay Boat & Ski Club

shore of De Anza Cove with approximately 1 acre of water use for non-motorized boats, an Interpretive Nature Center, and shared parking/service infrastructure as identified on PEIR Figure 3-1, Site Plan. The project seeks to implement the recommendations of the MBPMP. Appendix B, Land Use Consistency Tables, of the PEIR includes a consistency analysis and determines that the project would be consistent with the goals of the MBPMP. No further revisions to the PEIR are warranted.

O12-5: This comment summarizes other organizations that the Club partners with and programs the Club offers. This comment further requests that the Club be included in the project. Please refer to response to comment O12-4. The project would include approximately 1 acre of water use for non-motorized boats, which could accommodate programs like the Youth Nature Kayak Program currently offered by the Club. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

O12-6: This comment includes a list of the attachments provided. This is a closing comment for the letter and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. No further response is warranted.



Brief History of the Club

- 1940 – Club founded as the San Diego Speedboat Club
- 1953 & 1957 – U.S. National Water Ski Championships held in San Diego
- 1963 – Blind Ski Program started by Santo Lo Presto
- 1964 – Club & member Bill Muncey brings Bayfair back to San Diego
- 1965 – Club moved from San Diego Bay to Mission Bay
- 1971 – World Record “Speed Twin” pulls 58 skiers
- 1980 – San Diego Water Ski Team formed
- 1995 – Water Ski Hall of Fame inducts member Larry Penacho (club emblem)
- 1996 – Ikuna Koa Outrigger Canoe Club joins with club
- 2014 – Scott Leason wins water ski Gold Medal at Disabled Championships
- 2020 - Club celebrates 80 Years of serving the San Diego community
- 2022 – Club sponsors first Youth Nature Kayak Program on Rose Creek
- 2023 – Club celebrates 60 Years of sponsoring Blind Ski Clinics

O12-7: This comment is an attachment that provides a brief history of the Club and the programs it provides. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR, and no further response is warranted.

O12-7
cont.

Our Clubs & Programs

Youth Nature Kayak Program

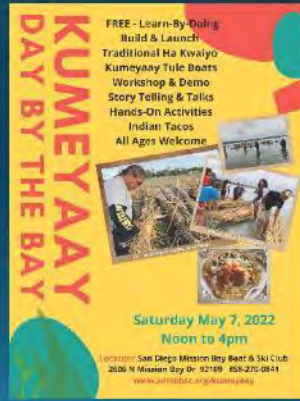


RTC-7
cont.

Kumeyaay Day



O12-7
cont.



**KUMEYAAY
DAY BY THE BAY**

FREE - Learn-By-Doing,
Build & Launch
Traditional Ha Kwaiyo
Kumeyaay Tule Boats
Workshop & Demo
Story Telling & Tallies
Hands-On Activities
Indian Tacos
All Ages Welcome

Saturday May 7, 2022
Noon to 4pm

Location: San Diego Mission Bay Boat & Ski Club
2026 N Mission Bay Dr. 92169 619-270-0844
www.mtsdc.org/kumeyabay

The poster features a yellow background with a vertical title 'KUMEYAAY DAY BY THE BAY' in red and black. It lists various activities and is decorated with small images of people and boats. The event details, including the date, time, and location, are provided at the bottom.

Blind Ski Clinics



Fox News Channel 5

Scott Lesson Wins Gold Medal at Regional Disabled Water Ski Championship
Scott will Ski at the Disabled Water Ski National Championships



Outrigger Canoe Paddling



X12-7
cont.



Concrete Canoe Teams



UC San Diego
Jacobs School of Engineering



Water Skiing



X12-7
cont.



Over 2000+ Local Club Family
Members & Friends....and growing!



SDMBBSC = Affordable Access & Programs for ALL

O12-7
cont

O12-8: This comment is an attachment that provides an online petition contact list. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR, and no further response is warranted.

petition_signatures_jobs_35897859_20230411043538

Name	City	State	Postal Code	Country	Signed On
Jackie Niznik	San Diego	CA		US	2023-04-03
Brian Niznik	Los Angeles	CA	90050	US	2023-04-03
Jackie Kempton	San Diego	CA	92130	US	2023-04-04
Lorraine Mata	San Diego	CA	92116	US	2023-04-04
Lorraine Mata	San Diego	CA	92139	US	2023-04-04
Kevin Witherell	San Diego	CA	92109	US	2023-04-04
Amy Schuler	Santa Ana	CA	92703	US	2023-04-04
Jade Kempton	Fort Collins	CO	80521	US	2023-04-04
Adam Kaluba	Burleson	TX	76028	US	2023-04-05
Steele Young	San Diego	CA	92111	US	2023-04-08
Michelle Elghardgui	San Diego	CA	92110	US	2023-04-08
Hayley Curriell	San Diego	CA	92110	US	2023-04-08
Hicham Elghardgui	San Diego	CA	92110	US	2023-04-08
Ian McDonald	Sacramento	CA	94203	US	2023-04-08
Jenna Toth	Descanso	CA	91916	US	2023-04-08
AnnaMaria Alvarez	San Diego	CA	92110	US	2023-04-08
Damon Whittle	San Diego	CA	92109	US	2023-04-08
Jeaninne Paabody	San Diego	CA	92101	US	2023-04-08
Todd Toth	Descanso	CA	91916	US	2023-04-08
Sherri Souza	San Diego	CA	92110	US	2023-04-08
Jerry Brown	San Diego	CA	92101	US	2023-04-08
Michael Longhenry	Hiverside	CA	92501	US	2023-04-08
Steve Siers	San Diego	CA	92101	US	2023-04-08
Debra Hernandez	San Diego	CA	92192	US	2023-04-08
David Rodriguez	San Diego	CA	92101	US	2023-04-08
Jane Flanagan Brown	San Diego	CA	92111	US	2023-04-08
Falcon Knight	Brooklyn	NY	11226	US	2023-04-08
Adam Frozen	Atlanta		30344	US	2023-04-08
Jennifer Mann	Murietta	CA	92562	US	2023-04-08

O12-8

O12-8
cont.

William Trumbo	Philadelphia	PA	19148	US	2023-04-08
Daniel Stanley	Woburn	MA	1801	US	2023-04-08
Denise Ysais	San Diego	CA	92120	US	2023-04-08
Stacia Pence	Riverside	CA	92505	US	2023-04-08
DUKE YSAIS	San Diego	CA	92120-2571	US	2023-04-08
William Inugat	San diego	CA	92117	US	2023-04-08
rick & nancy whips	Wapakoneta		45895	US	2023-04-08
Thomas Kelley	San diego	CA	92102	US	2023-04-08
Justin Knox	San Diego	CA	92103	US	2023-04-08
Midori Doxey	San Diego	CA	92109	US	2023-04-08
Eric Campbell	Los Angeles	CA	90011	US	2023-04-08
Kathy Norman	Carlsbad	CA	92009	US	2023-04-08
Kolby Stockwell	Pascoag		2858	US	2023-04-08
Arthur Fletcher	Blairtown		7825	US	2023-04-08
Danielle Hansen	Waterloo	IA	50703	US	2023-04-08
Gloria Marrian	San Diego	CA	92113	US	2023-04-08
Michael Flanagan	San Diego	CA	92101	US	2023-04-08
Steve Larson	San Diego	CA	92109	US	2023-04-08
Mary Mann	Irvine	CA	92602	US	2023-04-08
Kristen Hill	Huntington Beach	CA	92649	US	2023-04-08
Lindsay DeFazio	San Diego	CA	92101	US	2023-04-08
Ann Pierce	San Diego	CA	92103	US	2023-04-08
Rachel McDonald	Walnut Creek		94597	US	2023-04-08
G. Diane Matthews-Marcelin	Carson		90746	US	2023-04-08
Robert Marraro	Corpus Christi		78414	US	2023-04-08
Emily Chin	Fremont		94538	US	2023-04-08
Richard McConnell	Olympia Fields		60461	US	2023-04-08
McKenzie Bradley	London		40744	US	2023-04-08
Elizabeth LeVin	Tustin		92780	US	2023-04-08
Jacuan Tankard	Norfolk		23504	US	2023-04-08
Allister Layne	Conyers		30094	US	2023-04-08
Ardith Arrington	Seattle		98103	US	2023-04-08

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cont.

Morgan Hutchins-Bevis	Anchorage		98618	US	2023-04-08
Brian Sethness	CHICAGO		60657	US	2023-04-08
Mykel Raese	Tucson		85742	US	2023-04-08
ANETTE SHAW	Washington	DC	20068	US	2023-04-08
Zed Trick	Brooklyn	NY		US	2023-04-08
Vulture Bones	Brooklyn	NY	11226	US	2023-04-08
Emma Natividad	El Paso		79925	US	2023-04-08
Ruth Rouse	Lusville		32780	US	2023-04-08
Colby Butler	Fort Worth		76127	US	2023-04-08
Elsa Guzman	Philadelphia		19148	US	2023-04-08
MMO Oubre	Heinco		23238	US	2023-04-08
Alisha Hether	Washington		48094	US	2023-04-08
Vijaya Uppala	Newark		94536	US	2023-04-08
Kennedy Baker	Cincinnati		45214	US	2023-04-08
kasey rezendes	Springfield		1101	US	2023-04-08
Anna Brown	Lemon Grove	CA	91945	US	2023-04-08
Joshua Curphey	Peterborough	PE7		US	2023-04-08
Theresa Panish	San Diego	CA	92108	US	2023-04-08
Holly Eaton	San Diego	CA	92110	US	2023-04-08
Shawn Wisdom	Dunellen		34433	US	2023-04-08
Andy Cabreja	Sleepy Hollow		10581	US	2023-04-08
Vicki Reid	Lake Havasu City	AZ	86404	US	2023-04-09
Doug McCrady	San Diego	CA	92102	US	2023-04-09
Sherry Hoff	Saxonburg	PA	16056	US	2023-04-09
Linda Olivas	San Diego	CA	92126	US	2023-04-09
Richard Richards	San Diego	CA	92113	US	2023-04-09
David C	San Diego	CA	92101	US	2023-04-09
Gregg Eckenrod	San Diego	CA	92101	US	2023-04-09
Courtney Brown	San Diego	CA	92108	US	2023-04-09
Madeleine Crissman	San Diego	CA	92101	US	2023-04-09
Sandra Butzke	San Diego	CA	92117	US	2023-04-09
Aixa Fielder	Los Angeles		90028	US	2023-04-09

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cont.

Slam Worldwide	Bristol		37620	US	2023-04-09
Vanessa Greene	Whitville		28472	US	2023-04-09
Lisa Walls	Pasadena City		30268	US	2023-04-09
Sean Nottorf	Keller		76248	US	2023-04-09
Mary Dawn Beebe	La Mesa	CA	91941	US	2023-04-09
Mynor Silva	New Rochelle		10801	US	2023-04-09
Christopher Joseph CHALME	SPRING HILL		34606	US	2023-04-09
Fake Twomad	Nashville		37072	US	2023-04-09
Jarrod Murphy	Bethel		6801	US	2023-04-09
Yuning Cui	Los Angeles		90009	US	2023-04-09
Colleen Gracee	Lumberton	TX	77657	US	2023-04-09
Melissa Janz	Santee		92071	US	2023-04-09
JON Miyada	Iron tree	CO	80124	US	2023-04-09
Shirren Gorton	San Diego	CA	92106	US	2023-04-09
Noemi Contreras	La Jolla		92092	US	2023-04-09
Larez Murray	Columbia		38401	US	2023-04-09
stop this	Dallas		75204	US	2023-04-09
honey rahmati	Los Angeles		91367	US	2023-04-09
John Manca	Safford		85546	US	2023-04-09
Susan Talley	San Diego	CA	92103	US	2023-04-09
Alicia O'Malley	San Diego	CA	92182	US	2023-04-09
Madeline Swan	Allentown		18109	US	2023-04-09
Claire Reader	Phoenix	AZ	85041	US	2023-04-09
Ino Rivera	Escondido	CA	92082	US	2023-04-09
Karon May	San Diego	CA	92106	US	2023-04-09
Suzanne Predney	San Diego	CA	92110	US	2023-04-09
Myriam Palacin	Las Vegas	NV	89101	US	2023-04-09
Robin Bechtel	San Diego	CA	92177	US	2023-04-09
andy the apple				US	2023-04-09
Jhoana Hernandez	Mesquite		75149	US	2023-04-09
Yirina Wang	Irvine		92602	US	2023-04-09
sameneh salimi	New York		10013	US	2023-04-09

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cont.

Lord Tabby	LeRoy		49665	US	2023-04-09
elena italiano	Clifton		7013	US	2023-04-09
Gabriel Booker	Petersburg		23806	US	2023-04-09
Kiara mcgill	Indianapolis		46224	US	2023-04-09
Iru Iocking	Hiobing		55746	US	2023-04-09
Dijidj Chic ndi	Charlotte		28202	US	2023-04-09
Jesse Oglesby	Atlanta	GA	30309	US	2023-04-09
Kira Kelly	Luckerton		8087	US	2023-04-09
Alejandro Zermeno	Paris		75460	US	2023-04-09
Charlotte Wright	Lake Village		48348	US	2023-04-09
shianne alexander	Mayfield		42066	US	2023-04-09
Kristan Kalepp	Los Angeles	CA	90060	US	2023-04-09
Bill Kronberger	Kekukuni	IL	83340	US	2023-04-09
Sam Combs	Eagle		83616	US	2023-04-09
Tamika Clark	Waltham		2452	US	2023-04-09
Lisa Makow	Marietta	GA	30006	US	2023-04-09
norman fremar	Indio		92201	US	2023-04-09
rachael Glogovsky	Lake Geneva		53147	US	2023-04-09
Aleire Folkes	Jerriaca		11434	US	2023-04-09
Madeline Salafia	Peoria	AZ	85345	US	2023-04-09
Lisa Cairncross	San Diego	CA	92110	US	2023-04-09
Brett May	Fort Lauderdale	FL	33316	US	2023-04-10
Karen Boudreau	San Diego	CA	92101	US	2023-04-10
Robin Stoddard	Cottonwood	AZ	86326	US	2023-04-10
Danielle Verbrugghen	San Diego	CA	92101	US	2023-04-10
Frank Short	Sanee	CA	92071	US	2023-04-10
Paula Goleta	La Mesa	CA	91942	US	2023-04-10
Kris Ryner	San Diego	CA	92101	US	2023-04-10
Danielle Tentachert	San Diego	CA	92101	US	2023-04-10
Kristen Ritchie	San Diego	CA	92110	US	2023-04-10
John Winklarath	Phoenix	AZ	85007	US	2023-04-10
Kim Woodruff	La Mesa	CA	91942	US	2023-04-10

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cont.

Cynthia Ornelas	San Diego	CA	92102	US	2023-04-10
Yasmine Horton	Bessmer		35020	US	2023-04-10
Brynn Johansen				US	2023-04-10
Michael Herrin	San Diego	CA	92101	US	2023-04-10
Alison Wilson	San Diego	CA	92101	US	2023-04-10
greg hess	San Diego	CA	92104	US	2023-04-10
Alex Cheese				US	2023-04-10
Scott Oswald	San Diego	CA	92110	US	2023-04-10
Tom Hilgert	San Diego	CA	92071	US	2023-04-10
Elena Kogan	San Diego	CA	92126	US	2023-04-10
Stanislav Kogan	San Diego	CA	92121	US	2023-04-10
Victoria Kruser	San Diego	CA	92192	US	2023-04-10
Tom Caron	San Diego	CA	92101	US	2023-04-10
Ronnie Dellarsina	San Diego	CA	92106	US	2023-04-10
Emily Bishop	San Diego	CA	92110	US	2023-04-10
Greg Moss	San Diego	CA	92177	US	2023-04-10
David Card	San Diego	CA	92120	US	2023-04-10
Jann Smith	San Diego	CA	92122	US	2023-04-10
David DeLong	San Diego	CA	92101	US	2023-04-10
Bill Fox	San Diego	CA	92117	US	2023-04-10
Cheryl Berry	San Diego	CA	92192	US	2023-04-10
James Card	Buena Park	CA	90620	US	2023-04-10
Debi Praece	San Diego	CA	92101	US	2023-04-10
Kerry Thompson	San Diego	CA	92117	US	2023-04-10
Shiloe Parsons	Riverside	CA	92503	US	2023-04-10
Laurie Marlene	Fontana	CA	92335	US	2023-04-10
Justin Parsons	San Diego	CA	92110	US	2023-04-10
Lana Tsybal	San Diego	CA	92130	US	2023-04-10
Scott Byrnes	San Diego	CA	92109	US	2023-04-10
Mark Handmacher	San Diego	CA	92110	US	2023-04-10
Holly Brock	San Diego	CA	92117	US	2023-04-10
Brian Sims	San Diego	CA	92117	US	2023-04-10

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cont.

Jessica Ysasaga	San Diego	CA	92126	US	2023-04-10
Susan Fall	San Diego	CA	92101	US	2023-04-10
Brian Fortmann	San Diego	CA	92117	US	2023-04-10
Dante Medori	Jenkintown		19046	US	2023-04-10
Karen Fortmann	San Diego	CA	92117	US	2023-04-10
sunsook jang	Naperville		60564	US	2023-04-10
Timothy Hagood	Phoenix	AZ	85041	US	2023-04-10
Isiaha Howell	Akron		44301	US	2023-04-10
Roger Bradley	Daytona Beach	FL	32118	US	2023-04-10
Montrea Thomas	Prairie View		77446	US	2023-04-10
Cullen McDaniel	Astoria		54806	US	2023-04-10
Srinivas Polavarapu	Collierville		38017	US	2023-04-10
Kenneth Iedgard	San Diego	CA	92110	US	2023-04-10
JEAN GUSTAVE CADET	Reston		20190	US	2023-04-10
Daniel Fuller	San Diego	CA	92117	US	2023-04-10
Gorman Melody	Covington		70420	US	2023-04-10
Bryan Winkler	San Diego		92122	US	2023-04-10
Katie Binning	San Diego	CA	92110	US	2023-04-10
Jessica Miller	Rosemead		54974	US	2023-04-10
Ash Heart				US	2023-04-10
Jentzen Chan	Orlando		32802	US	2023-04-10
Daniel O'Brien	MILTON		12547	US	2023-04-10
Jinghong Chen	Davis		95618	US	2023-04-10
Kokichi Ouma	Tulahoma		37388	US	2023-04-10
Carly Rosenberg	Minneapolis		55401	US	2023-04-10
Donata Hammonds	Anaheim	CA	92805	US	2023-04-10
Requel Miranda	Brooklyn		11223	US	2023-04-10
Zaejahn Brown	Rancho Cucamonga		91701	US	2023-04-10
Vishruth Muddesani	San Ramon		94583	US	2023-04-10
chloe leonard	Cincinnati		45244	US	2023-04-10
Audrey Browning	Montgomery		77356	US	2023-04-10
Ross Andresen	Charlotte		28202	US	2023-04-10

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cont.

DAVID PETERS				US	2023-04-10
Angela Mincey	Austin		78754	US	2023-04-10
mary koroman	Culver City		90230	US	2023-04-10
Jude soweih	Mansfield		76063	US	2023-04-10
Becky Miller	Fort Myers		33967	US	2023-04-10
Ja'Mia Dobbins	West Memphis		72301	US	2023-04-10
Meilissa Freeman	Los Angeles	CA	90039	US	2023-04-10
Philemon St Paul	Hartford		6105	US	2023-04-10
Domino Thap	Houston		77052	US	2023-04-10
Natalia Ziserson	San Diego	CA	92101	US	2023-04-10
Natalia Kisilitsyn	San Diego	CA	92128	US	2023-04-10
Robert Supple	La Jolla	CA	92037	US	2023-04-10
Maurcen Galindo	San Diego	CA	92106	US	2023-04-10
Suzanne Moss	San Diego	CA	92117	US	2023-04-10
Roberta Bradbury	San Diego	CA	92101	US	2023-04-10
Barbara Stewart	Spring Valley	CA	91978	US	2023-04-10
Tro Murphey	San Diego	CA	92128	US	2023-04-10
Yasim Bilentir Oksuz	Henderson	NV	88077	US	2023-04-10
Lidiya Pomaskin	San Diego	CA	92119	US	2023-04-10
Levon Arzumanov	San Diego	CA	92101	US	2023-04-10
Sergey Kisilitsyn	La Habra	CA	90631	US	2023-04-10
Bethany Cummins	San Diego	CA	92110	US	2023-04-10
Marcie Bober-Michel	San Diego	CA	92117	US	2023-04-10
Rayyan Gee	Frisco		75035	US	2023-04-10
Robert Marraro	Corpus Christi		78414	US	2023-04-10
Heaven Guerrero	Van Nuys		91411	US	2023-04-10
Juniper W	Portland		0	US	2023-04-10
Miguel Soriano	San Ana		92712	US	2023-04-10
Jeff Baber	Kansas City		64157	US	2023-04-10
Christine Lewis	San Diego	CA	92110	US	2023-04-10
Mike Brucker	Ontario	CA	91764	US	2023-04-10

Save Mission Bay Recreation

Save the Boat Club

PETITION

We, the undersigned are local residents, members, family and visitors of Mission Bay and the San Diego Mission Bay Boat & Ski Club ("SDMBBSC"). We are also participants of the many affordable recreational programs offered in the Northeast Mission Bay area. **WE HEREBY OPPOSE THE CURRENT PLANS FOR THE DE ANZA NATURAL PROGRAM** which were released on 6 March 2023. We strongly encourage the City to reconsider the plans for De Anza Natural and re-design the plan in a way that allows these programs to continue to be offered to our local community.



O12-9

Name	Signature	Zip Code	Email
Thomas Lapan	<i>[Signature]</i>	92117	BThydrichull@gmail.com
Patrick Wilson	<i>[Signature]</i>	92011	pat.wilson@gmail.com
Shawn Morris	<i>[Signature]</i>	92040	shawn.morris@san-diego.gov
Rick Carlson	<i>[Signature]</i>	91910	ricky_djz@yahoo.com
Robert Manns	<i>[Signature]</i>	92026	bobm1944@gmail.com
Karen Manns	<i>[Signature]</i>	92020	kjmanns@gmail.com
Trevor Manns	<i>[Signature]</i>	92020	trevormanns@gmail.com
Steve McMichael	<i>[Signature]</i>	92019	1540 William Blvd E. CA 92019
Blair Husson	<i>[Signature]</i>	92019	1977 Somers Dr E. CA
Peter V. Daly	<i>[Signature]</i>	92117	Peter@DALYCONSTRUCTION.COM
Michael Clyburn	<i>[Signature]</i>	92109	0718@SAN-PR.COM
William W. Johnson	<i>[Signature]</i>	92110	0718@SAN-PR.COM
Chris Hansen	<i>[Signature]</i>	92109	CHansen@gmail.com
Sean Adams	<i>[Signature]</i>	92119	seanadams1325@gmail.com
Tim Bergquist	<i>[Signature]</i>	91941	bergquist@cox.net
Nedra	<i>[Signature]</i>	92117	exachas@yahoo.com

O12-9: This comment is an attachment that provides a petition signed by Club members opposing to the project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR, and no further response is warranted.

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O12-9
cont.

Name	Signature	Zip Code	Email
Doreen Millet	<i>[Signature]</i>	92071	doreenmillet@gmail.com
George Pappan	<i>[Signature]</i>	92122	g.pappan@san-diego.com
Carol Parham	<i>[Signature]</i>	92122	cparham@gmail.com
Richard Baker	<i>[Signature]</i>	92109	rbaker88@gmail.com
Anita Sgobba	<i>[Signature]</i>	92110	asgobba@gmail.com
Sonya Chandra	<i>[Signature]</i>	92122	Sonya@SanDiego.com
Jane George	<i>[Signature]</i>	92109	jane@san-diego.com
Julie Phillips	<i>[Signature]</i>	92109	JulieKPhillips@gmail.com
DAVID PHILLIPS	<i>[Signature]</i>	92109	phillipsd7@gmail.com
Jan Schoen	<i>[Signature]</i>	92037	jschoen87@icloud.com
Dani Setton	<i>[Signature]</i>	92087	daj5729@yahoo.com
Fimer Garcia	<i>[Signature]</i>	92117	fgarcia@san-diego.com
MELLA WOOD	<i>[Signature]</i>	92064	MELLAWOOD@gmail.com
Robert Navarro	<i>[Signature]</i>	92106	demarcant@johnc.com
PAULINE ALLEN	<i>[Signature]</i>	92105	PaulineAllen@protonmail.com
DEBORA	<i>[Signature]</i>	92111	SATURN@COMCAST

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O12-9
cont.

Name	Signature	Zip Code	Email
CHUCK KENNEDY	<i>[Signature]</i>	92102	CHUCKKENNEDY@GMAIL.COM
ED HAASE	<i>[Signature]</i>	92117	edhaase@gmail.com
JOHN TEPAN	<i>[Signature]</i>	92117	JATIZ@GMAIL.COM
JACK JACOBSON	<i>[Signature]</i>	92109	jack@jacobson.com
MICHAEL	<i>[Signature]</i>	92107	michael@...com
JAMES SUTCLIFF	<i>[Signature]</i>	92117	jsutcliff@gmail.com
MARK BENEDEK	<i>[Signature]</i>	92154	MARK.BENEDEK@240DATA.COM
DAVID GUINN	<i>[Signature]</i>	92120	MRDAGWINN@GMAIL.COM
Susan Fall	<i>[Signature]</i>	92109	Susanfall123@gmail.com
Carly Chance	<i>[Signature]</i>	92110	carly@...com
ROXANNE MILLS	<i>[Signature]</i>	92117	roxannehrmiller@gmail.com
DAVID CARLOS	<i>[Signature]</i>	92117	CLM17DAVE@GMAIL.COM
GERARD STANES	<i>[Signature]</i>	92117	MIXER-GRUBB@...com
BENJAMIN CLARK	<i>[Signature]</i>	92117	TRUMP2020@aol.com
THOMAS SAHRA	<i>[Signature]</i>	92117	Thomas.Sahra@...com

Save Mission Bay Recreation

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O12-9
cont.

Name	Signature	Zip Code	Email
JOE MANIZER	<i>[Signature]</i>	92103	SMANZER@ucsd.edu
JOE KADDOUCH	<i>[Signature]</i>	92117	Redhouse@aol.com
Carlin Kaurabek	<i>[Signature]</i>	92127	elbisqami@aol.com
BRACK WESSMAN	<i>[Signature]</i>	92029	SDTREVOK@GMAIL
Pete Willhite	<i>[Signature]</i>	92124	pwillhite75@gsn.net
MIKE MILNER	<i>[Signature]</i>	92009	mike@sanally.com
Jim Christik	<i>[Signature]</i>	92129	Jim@carver.com
NATHAN ANDERSON	<i>[Signature]</i>	92120	ANDERSON101@GMAIL.COM
Jennifer Anderson	<i>[Signature]</i>	92120	JANLAND79@HOTMAIL.COM
WALTER SERRITTO	<i>[Signature]</i>	92117	MSERRITTO@SAN.DIC
WAYNE FRATER	<i>[Signature]</i>	92107	WFRATER@GMAIL.COM
GORDON NIKKOLA	<i>[Signature]</i>	92109	GNIKKOLA@COX.NET
John Calk	<i>[Signature]</i>	92065	Pringoda@yahoo.com
BILL WATTS	<i>[Signature]</i>	92110	BILLWATTS@GMAIL.COM
Robert Kuzon	<i>[Signature]</i>	92120	rk1112@pacbell.net
Casper Calando & Roger Babel	<i>[Signature]</i>	92107	caspar@cox.net

Save Mission Bay Recreation

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O12-9
cont.

Name	Signature	Zip Code	Email
Brent Seijas	[Signature]	92021	Seijasfan4@gmail.com
Boyd Dadd	[Signature]	92111	bdadd@9250@gmail.com
Steve Dadd	[Signature]	92111	stevemans1@gmail.com
Vicky Long	[Signature]	92026	longvicky26@aol.com
MIKE WAGNER	[Signature]	92111	wags549@aol.com
John [unclear]	[Signature]	92019	[unclear]
John [unclear]	[Signature]	7	111
Theresa Robertson	[Signature]	92016	Theresa.Robertson47@aol.com
Michael Evans	[Signature]	91942	OUT OF TWO NICKS @ HOTMAIL.COM
SUSAN HOPPER	[Signature]	92021	hopperhouse143@gmail.com
MARK WATKINS	[Signature]	92071	Watkins Coy. Net
Martha Lujan	[Signature]	92111	MarthaL@rocketmail.com
Anna Schuler	[Signature]	92109	schuler23@aol.com
[unclear]	[Signature]	92109	[unclear]
Emiri Raftery	[Signature]	92090	emiri@cox.net
Kevin Raftery	[Signature]	92109	Kraft21@yohio.com

Save Mission Bay Recreation

Save the Boat Club

PETITION

We, the undersigned are local residents, members, family and visitors of Mission Bay and the San Diego Mission Bay Boat & Ski Club ("SDMBBSC"). We are also participants of the many affordable recreational programs offered in the Northeast Mission Bay area. **WE HEREBY OPPOSE THE CURRENT PLANS FOR THE DE ANZA NATURAL PROGRAM** which were released on 6 March 2023. We strongly encourage the City to reconsider the plans for De Anza Natural and re-design the plan in a way that allows these programs to continue to be offered to our local community.



O12-9
cont.

Name	Signature	Zip Code	Email
Rhonda Morrison	<i>Rhonda Morrison</i>	92107	Rhonda.Morrison@aol.com
Kevin Lenz	<i>Kevin Lenz</i>	92105	xx x @
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Steve Wolf	<i>Steve Wolf</i>	92029	SteveWolf@tsc.com

Save Mission Bay Recreation

Save the Boat Club

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O12-9
cont.

Name	Signature	Zip Code	Email
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Frank Kent	[Signature]	92024	frank.kent@earthlink.net
Amanda Cogan	[Signature]	92107	amanda.cogan@gmail.com

Save Mission Bay Recreation

Save the Boat Club

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cont.

Name	Signature	Zip Code	Email
VERA CARTER	<i>Vera Carter</i>	91942	
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Save Mission Bay Recreation

Save the Boat Club

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Name	Signature	Zip Code	Email
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Save Mission Bay Recreation

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cont.

Name	Signature	Zip Code	Email
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Roxanne Flores	[Signature]	92110	
BEAL FOOD	[Signature]	92110	
Wade Willmont	[Signature]	92111	
AKA REA WHERRE ANZA	[Signature]	92014	
Michelle A. Murphy	[Signature]	92109	
Wade Willmont	[Signature]	92137	
Sanjay [unclear]	[Signature]	92127	POLE BAY @ GMAIL.COM
Wade Willmont	[Signature]	92127	WASYMAN@CSCINET
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Pat [unclear]	[Signature]	92129	
Wade Willmont	[Signature]	92129	WVW@JSHOO.COM
Hishu Bina	[Signature]	92021	

Save Mission Bay Recreation

Save the Boat Club

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cont.

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KATI SHERIDAN	<i>[Signature]</i>	92110	92110
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Katie Lewis	<i>[Signature]</i>	92119	92119
Wyatt Lewis	<i>[Signature]</i>	92021	wyatt.lewis@gmail.com

Save Mission Bay Recreation

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O12-9
cont.

Need email!

Name	Signature	Zip Code	Email
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Mark Handmacher	[Signature]	92110	
Mikie Durr	[Signature]	92109	
Floyd Kifer	[Signature]	92109	
Michael Treanor	[Signature]	91902	
Wendy Kaiser	[Signature]	91902	
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Save Mission Bay Recreation

Save the Boat Club

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Stacy Gierczak	<i>[Signature]</i>	92120	stacygierczak@aol.com
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Save Mission Bay Recreation

Save the Boat Club

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O12-9
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Save Mission Bay Recreation

Save the Boat Club

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cont.

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Save Mission Bay Recreation

Save the Boat Club

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O12-9
cont.

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Save the Boat Club

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cont.

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cont.

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George Heatherington	<i>[Signature]</i>	92110	gecheatherington@gmail.com

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cont.

Name	Signature	Zip Code	Email
Steve Shurt	Steve Shurt	91915	
Marie Parker-Wood	Marie Parker-Wood	92110	
Gary C. Webb	Gary C. Webb	92122	
Ravi Banawale	Ravi Banawale	92020	
Kathy Banawale	Kathy Banawale	92020	
Tim Parsons	Tim Parsons	92117	
Kandee Parsons	Kandee Parsons	92103	
Paul Van der Horst	Paul Van der Horst	92117	
Pauline Van der Horst	Pauline Van der Horst	92117	
Michelle Carter	Michelle Carter	92021	

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Sunny Joslin	<i>[Signature]</i>	92040	sunnyj@live.com
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TAMARA ROBINSON	Tamara Robinson	92110	tamararob159@gmail.com
Tanya New	<i>[Signature]</i>	92109	Tanya@Yahoo.com
NANETTE CLAYTON	<i>[Signature]</i>	92117	
Jenna Clark	<i>[Signature]</i>	92117	jenna52@aol.com
Renee Riches	<i>[Signature]</i>	92118	reneeriches@gmail.com
Kathleen Brad	<i>[Signature]</i>	92117	
DAN ROBERTS	<i>[Signature]</i>	92117	
KAT STEPHENS	<i>[Signature]</i>	92116	
Krista	<i>[Signature]</i>	92116	
Krista	<i>[Signature]</i>	92142	kristajane@aol.com
Kat Lawry	<i>[Signature]</i>	92119	
Wyatt Lund	<i>[Signature]</i>	92021	wyatt.lund@gmail.com

JWA J. Whalen Associates, Inc.

PREPARED BY THE PROJECT TEAM FOR THE CITY OF SAN DIEGO

April 19, 2023

CEQA Section
City of San Diego
202 C Street
San Diego, CA 92101

Re: Comments on De Anza Natural Draft Program Environmental Impact Report
SCH #2018061024

To Whom This Concerns:

San Carlos De El Estero
San Carlos De El Estero
San Carlos De El Estero
San Carlos De El Estero
San Carlos De El Estero
San Carlos De El Estero
San Carlos De El Estero

This firm represents the San Diego Mission Bay Boat & Ski Club (Club), which is gravely concerned that the well-intentioned De Anza Natural Plan as drafted will unnecessarily spell the end of an 80-year-old San Diego institution. The Club dates back to its original home on San Diego Bay and from there to Mission Bay where it has been since 1963 in a historic tiki-style clubhouse. The Club is the last bastion of the days when San Diego wasn't such an expensive place to enjoy its natural resources.

The San Diego Mission Bay Boat & Ski Club is a 300 local family-member, *non-profit* organization that promotes Mission Bay as an active recreational center for all to enjoy, especially those of working-class means. While the Club commends the City's efforts in moving forward with plans to reestablish lost wetlands at De Anza Cove, it was disheartening to see the Club summarily eliminated from the De Anza Natural Plan as evidenced by the proposed land use map in the NOP and Draft EIR. However, a simple commitment to a phasing and funding compromise solves the problem that the flawed EIR nonetheless spotlights.

For background, the Club has operated in San Diego since 1940 and provides low-cost recreation amenities for San Diego residents and visitors, inclusive of all races, ages, genders, sexual orientations or disabilities. The Club takes up only a small footprint (please see attached aerial photo) within the greater De Anza Cove area but would be forced to close if the De Anza Natural plan is approved without mitigation of the Club's displacement.

While the De Anza Natural Plan touts increased opportunities for recreational enjoyment, if the De Anza Plan proceeds as intended, the Club, which is the premier provider of Mission Bay recreation for the broadest group of stakeholders, would be removed, forcing the end of the recreational programs and clinics the Club has provided for decades. This would run counter to the Project Objectives of the Mission Bay Master Plan (i.e. Land Use Goal 1, Water Use Goal 1, Water Use Goal 4, Economic Goal 1, Economic Goal 2, and Economic Goal 3), and also the De Anza Natural Project Objective #5, which urges that the Project "Diversify active and passive recreational uses that will serve a range of interests, ages, activity levels,

O12-10

O12-10: This comment is an attachment that provides comments on the PEIR. This attachment is a duplicate of comment letter O9 (J. Whalen Associates, Inc., on behalf of San Diego Mission Bay Boat and Ski Club, comment letter). Please refer to responses to comments O9-1 through O9-9.

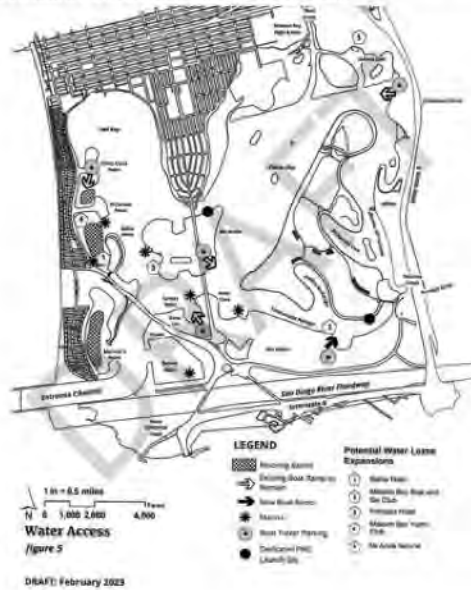
incomes both on land and in water". Closing the Club is inconsistent with all of the foregoing Project Objectives and also the Mission Bay Master Plan, which anticipates moving the Club to South Shores.

Here are our comments on the draft Program EIR:

- 1) Relocation isn't currently a feasible alternative—while a new site in South Shores Park would be suitable, no work has been done to ready the site, including such fundamental steps as land surveying, biological resource mapping, environmental analysis, and site planning. The South Shores General Development Plan also needs updating. It also may be that the landfill that underlies the future site may render the property unsafe due to the presence of hazardous materials. For this reason, the PEIR needs to correct the misconception that the Club can simply vacate its current site and move.

Deferring analysis can be acceptable in a Program EIR, but not if it leaves the impression to the reader that a solution is feasible when it isn't. There is no place for the Club to move today, nor has funding been identified to accomplish the permitting and construction of new Club facilities. Please see Figure 5 *Water Access* from the De Anza Natural Plan below for the proposed relocation site, marked as the second of a list of Potential Water Lease Expansions.

O12-10
cont.



O12-10
cont.

2) The PEIR misstates the activities on the Club property in the statement in the Historical Resources Constraints Analysis Memorandum for the PEIR, dated March 12, 2019. Stating that the Club area is currently used as a "boat storage facility", coupled with language in the Memorandum that implies Club activities are a thing of the 1970's past, makes the reader think the Club is inactive today when nothing could be further from the truth. Boats are obviously going to be stored there because they need to be launched into water. Just as important, the storage of the boats provides revenue needed to fund the programs of Club Partners, which include:

- a. Blind Community Center of San Diego
- b. San Diego Center for the Blind
- c. Braille Institute San Diego
- d. San Diego Lifeguards
- e. Southern California Outrigger Racing Association
- f. San Diego's Pacific Islander community
- g. Ikuua Koa Outrigger Paddling Club
- h. Kai Elua Outrigger Paddling Club
- i. San Diego State's Concrete Canoe Team
- j. San Diego Audubon Society and the Kumeyaay tule boat program
- k. Friends of Rose Creek
- l. Pacific Beach Town Council
- m. Dana Landing
- n. San Diego Associations of Yacht Clubs
- o. Sailors for the Sea
- p. Convair Water Ski Team
- q. United San Diego Water Ski Team
- r. University of San Diego Water Ski Team
- s. Golden State Flycasters
- t. US Coast Guard Auxiliary
- u. California Division of Boating & Waterways (DBW)
- v. Old Mission Beach Athletic Club (OMBAC)

These programs do not have another location, and their loss would be an unmitigated significant impact with the proposed Plan. The section of the De Anza Natural Plan on Historical, Archeological, and Tribal Cultural Resources correctly states that the project could result in the alteration of a prehistoric or historic building, object, structure, or site, but then unacceptably states that no mitigation measures are proposed when in fact there are feasible measures that can solve the problem. Why would the City wish to make CEQA Findings and Overriding Considerations for Historical, Archeological, and Tribal Cultural Resources, the only project impacts that have not been reduced to Less than Significant when a compromise on phasing and funding support solves the problem?

3) The question of inverse condemnation or relocation expense liability is not addressed in the PEIR. The government may argue it has no duty due to the month-to-month lease structure, but relocating to a new location cannot come at the expense of an 80-year-old financially successful operation. Inverse condemnation occurs when the government takes private property for public

use without just compensation or by imposing regulations that deprive a property owner of all economically viable use of their property.

In the context of a tenant being forced to vacate premises by government action, inverse condemnation may come into play if the government action results in the property owner being deprived of all economically viable use of their property. Here, the City is proposing to force the Boat & Ski Club to vacate in order to build a public park, and the City proposes that the property owner not be compensated for the loss of income or to the value of the Club's property. In this case, the property owner may have a claim. It is straightforward that since the Club is being threatened with removal, the City's blithe action will result in the taking of their property without just compensation.

While courts have recently found in *California Cartage Company vs. City of Los Angeles* that terminating a short-term lease does not constitute a taking for purposes of eminent domain law, the circumstances are different when it comes to a claim for relocation expenses. In the relocation context, a different set of regulations apply that do not necessarily require a taking of private property. There is a reasonable argument that the standard for qualifying for relocation benefits as a displacee is lower than the standard for proving a taking for inverse condemnation liability.

In conclusion, rather than urging the adoption of the No Project Alternative, the only PEIR alternative that keeps the Club operating, a compromise is proposed. We hope you will work with the San Diego Mission Bay Boat & Ski Club to keep them operating by phasing the wetlands restoration so the Club would remain its current location until the new site in South Shores Park is permitted and built. In this way, the Club can continue to serve the San Diego community while the De Anza Natural plan is being realized.

Very truly yours,


J. Whalen Associates, Inc.,
a California corporation

by James E. Whalen
President

Attachment

cc: San Diego Mission Bay Boat & Ski Club
Alexander Llerandi (California Coastal Commission)
Brian Elliott (Office of Councilmember La Cava)

O12-10
cont.

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Comment Letter O13: San Diego Natural History Museum, April 19, 2023

O13

O13-1: This comment provides an introduction to the comment letter. It does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

From: [Chena Popper](#)
To: [PLN Planning/CEO](#)
Cc: [Judy Gradwohl](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan DEIR - Comment
Date: Wednesday, April 19, 2023 4:28:29 PM
Attachments: [image001.png](#)
[J. Gradwohl comment on draft EIR for De Anza Natural Plan.pdf](#)

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O13-1

Hello,
Please find attached a comment on the draft EIR for the city's De Anza Natural Plan from Judy Gradwohl, President and CEO, San Diego Natural History Museum.
Please let me know if you have any questions.

Regards,

Chena Popper
Pronouns: She/Her
Executive Assistant

the nat | SAN DIEGO
NATURAL HISTORY
MUSEUM

P 619.255.0216 (Office)
E cpopper@sdnhm.org

If we seem busy, it's because we have millions of years of work to do. [Find out](#) what we're up to.

Mailing address: P.O. Box 121390, San Diego, CA 92112-1390
Street address: 1788 El Prado, San Diego, CA 92101
[Website](#) [Facebook](#) [Twitter](#) [Instagram](#) [YouTube](#) [LinkedIn](#)

SAN DIEGO NATURAL HISTORY MUSEUM

April 19, 2023

Re: De Anza Natural Wetland Restoration Plan

Dear City of San Diego,

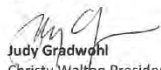
O13-2 | The San Diego Natural History Museum strongly supports maximum wetland restoration in Mission Bay. Science shows that wetlands are a critical habitat, important components of our shoreline, and extremely valuable in protecting our coastal infrastructure. The water quality of Mission Bay cannot be improved or maintained without sufficient wetlands.

O13-3 | In order to make the City's wetland restoration effort successful, we ask that you fully address a number of key environmental issues in the De Anza Natural Wetland Restoration Plan, including:

- O13-4 | 1. **Clean water.** We need to improve the water quality of the study area and the bay through natural, resilient infrastructure.
- O13-5 | 2. **Address sea level rise.** The DEIR is missing foreseeable impacts from sea level rise. It is impossible to choose the best land use plan without knowing how the effect of climate change.
- O13-6 | 3. **Restore more tidal marsh.** The City's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035. However, the DEIR doesn't evaluate proposals against the acreage goals from the City's own Action Plan.
- O13-6 | 4. **Analyze of recreational and cultural opportunities.** Connecting a restored tidal ecosystem to Mission Bay Park would balance and expand the park's recreational offerings. This will ensure that all San Diegans have access to a vibrant, accessible tidal marsh.

O13-7 | We live in one of the most biodiverse regions in the United States and it is up to us to protect this unique and special place. Thank you for considering our recommendations on how to improve the De Anza Natural Plan and our valuable natural resources.

Sincerely,



Judy Gradwohl
Christy Walton President and CEO



P.O. BOX 121390, SAN DIEGO, CA 92112-1390
SDNAT.ORG | 619.232.2821 | 619.232.0248

O13-2: This comment provides the San Diego Natural History Museum's support for maximum wetland restoration. The City of San Diego (City) appreciates the San Diego Natural History Museum's participation in the review of the PEIR for the project. The commenter's preference is noted. This comment provides an introduction and does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O13-3: This comment states that water quality in the project area and Mission Bay needs to be improved through natural, resilient infrastructure. The project objectives listed in PEIR Chapter 3.0, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Section 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan.

O13-4: This comment states that the PEIR is missing details on the foreseeable impacts from sea level rise. A Sea Level Rise Assessment Technical Report was prepared for the project and the Wetlands Optimized Alternative and is incorporated into the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable

wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise scenario.

O13-5: This comment states that the PEIR does not evaluate proposals against the City's Climate Action Plan's (CAP) goal of 700 acres of restored marshland by 2035. Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. PEIR Chapter 8.0 evaluates four alternatives that were selected for additional analysis. In addition, PEIR Chapter 8.0 also identifies the ReWild Mission Bay "Wild," "Wilder," and "Wildest" alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives is provided in PEIR Chapter 8.0.

Other restoration areas within the City's jurisdiction are being considered to meet the goals of the City's CAP. The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 225.1 acres of wetlands in Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific

management plan to protect, restore, and preserve wetland and upland areas on City-managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreages. No revisions to the PEIR are warranted.

O13-6: This comment states that the PEIR should analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem and that all San Diegans will benefit from access to a vibrant tidal wetland. The City agrees that the project would benefit all San Diegans, including members of local Tribal nations. However, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." No revisions to the PEIR are warranted.

O13-7: This comment is a closing comment for the letter. It does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is warranted.

Comment Letter O14: Allen Matkins on behalf of Northeast MB, LLC and Campland, LLC, April 20, 2023

O14

From: [Nelson, Shelley](#) on behalf of [Chine, Jeffrey](#)
To: [Sandel, Scott](#); [Moore, Jordan](#); [PLN, Planning/CEQA](#)
Cc: [Jacob, J. Gelfand](#); [Michael Gelfand](#); [Chris Wahl](#); [Ashley Johnson](#); [Chine, Jeffrey](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan/PEIR
Date: Thursday, April 20, 2023 2:09:29 PM
Attachments: [4-20-23 Comment LTR re Mission Bay Park Master Plan.pdf](#)

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Greetings,

On behalf of Jeff Chine, attached are comments to the Draft Amendment to the Mission Bay Park Master Plan, as well as the Mission Bay Park Master Plan Draft PEIR, submitted on behalf of our clients, Northeast MB, LLC and Campland, LLC. Please send a quick reply acknowledging receipt.

Kind regards,

Shelley Nelson | Legal Secretary for
Jeffrey A. Chine, Michael C. Pruter, Seth A. Garrett,
Lauren E. Palmer and Geoffrey K. Stauffer
Direct (619) 235-1555 x32238 | snelson@allenmatkins.com
Allen Matkins Leck Gamble Mallory & Natsis LLP
One America Plaza, 600 West Broadway, 27th Floor, San Diego, CA 92101-0903
[Allen Matkins](#)

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O14-1: This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

O14-1

Allen Matkins

Allen Matkins Leck Gamble Mallory & Natisis LLP
Attorneys at Law
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Direct Dial: 619.235.1525 | File Number: 376949.00001/4888-7772-9626.3

Via Electronic Mail

April 20, 2023

Scott Sandel, Park Designer
City of San Diego, Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123

Jordan Moore, Senior Environmental Planner
City of San Diego, Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123

Re: **Comments on Mission Bay Park Master Plan – De Anza Amendment and Draft PEIR**

Dear Mr. Sandel and Ms. Moore:

Thank you for the opportunity to comment upon the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (“**Master Plan Amendment**”) and associated Draft Program Environmental Impact Report (“**PEIR**”). Our clients, Northeast MB, LLC and Campland, LLC, and their affiliated management company, have decades of experience managing RV campgrounds, marinas and other waterfront recreation facilities. We write in support of the Master Plan Amendment and believe it strikes an appropriate balance between environmental stewardship of important coastal natural habitats while fostering public access and affordable accommodations for all San Diegans. Please consider the following comments:

1. The Site Plan at Figure 3-1 of the PEIR illustrates proposed land uses. A total of 48.5 acres is allocated to “Low-Cost Visitor Accommodations,” a significant portion of which is situated on the southern side of the project area, separated from the balance of the Low-Cost Visitor Accommodations designation by water (in effect, an island). The Site Plan indicates two Multi-Use Paths connecting the island to the mainland. The Site Plan also designates several Vehicular Access Points. Please confirm that the Master Plan Amendment and PEIR contemplate vehicular access to all areas designated as Low-Cost Visitor Accommodations.

2. If the PEIR does not accommodate vehicular access, in our experience, the lack of direct vehicular access to campsites and other low costs accommodations creates a myriad of issues, such as an inability to provide vehicular access for maintenance, repair, rescue, and other crucial public and guest serving functions. It would also prevent any kind of RV use which would profoundly diminish accommodations types and public access. We therefore strongly urge that the Master Plan Amendment and PEIR clarify that vehicular access is contemplated to all areas designated Low-Cost Visitor Accommodations.

Los Angeles | Orange County | San Diego | Century City | San Francisco

O14-2: This comment provides an introduction to Campland on the Bay (Campland) and expresses support for the Amendment. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O14-3: This comment summarizes the Amendment’s low-cost visitor accommodations land use and requests confirmation that the Amendment and PEIR contemplate vehicular access to all areas designated as low-cost visitor guest accommodations. PEIR Chapter 3.0, Project Description, states that service roads, vehicular access, and parking would be in areas proposed for low-cost visitor guest accommodations, regional parkland, boating, and active recreation. However, as stated in PEIR Chapter 3.0, the project is an Amendment to the Mission Bay Park Master Plan (MBPMP). No development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. The PEIR acknowledges that the City of San Diego (City) will evaluate future detailed General Development Plans (GDPs) for future projects as they are developed. A GDP, as defined in City Council Policy 600-33, is a Conceptual Master Plan that identifies the activities and amenities to be included within a park. As described in PEIR Section 1.4.1, Type of PEIR, GDPs will be developed over time and will provide precise engineering and construction plans for the various elements of the project.

- O14-5 3. The Hydrology and Water Quality Technical Memorandum included as Appendix I to the PEIR states at page 2, "A new channel connecting Rose Creek to the De Anza Cove water area would be constructed at approximately Lilac Drive, creating a new island that would be accessed by two new bridges." We suggest that the statement be modified to say, "A new channel connecting Rose Creek to the De Anza Cove water area could be constructed..." We could not find a similar reference to new bridges in the Master Plan Amendment or PEIR. We suggest a clarification of the language to say, "A new channel connecting Rose Creek to the De Anza Cove water area could be constructed..."
- O14-6 4. If bridges are found to be required, please confirm whether such bridges are intended as a means of connecting the island to the mainland for the purpose of allowing water to flow unobstructed from Rose Creek to promote newly created wetlands within and adjacent to De Anza Cove.
- O14-7 5. There is no study provided that evaluates the efficacy of providing Rose Creek water flow directly into the De Anza Cove area. Rose Creek often delivers contaminants into Mission Bay. Those contaminants can adversely affect the swimming beaches contemplated and may negatively impact the wetlands contemplated to the east. Additionally, Rose Creek delivers large quantities of silt into Mission Bay. If this connection is considered, there should be an analysis of the impact the silt will have on this connection and the potential need for ongoing maintenance and clearing of the channel.
- O14-8 6. The San Diego Regional Water Quality Control Board requests a hydrologic model of the proposed new channel, but the PEIR does not include one. We agree that such analysis is needed. An alternative to providing Rose Creek water to the contemplated wetland east of De Anza Cove could be provided via a culvert along Grand Avenue or an underground culvert in the proposed location of the channel. If directing Rose Creek water to the eastern wetlands area is desirable, these should be evaluated as alternatives.
- O14-9 7. Bridges are very expensive and would render the planned future coastal accommodations less affordable and less accessible to the public. We suggest that the Master Plan Amendment and PEIR expressly allow the use of more cost-effective approaches addressed above. If it is found that directing Rose Creek water to De Anza Cove is desirable, the alternative strategies would dramatically improve pedestrian and vehicular mobility to and from the land to the south while allowing channel water to flow to the desired locations. It would also provide for more camping and improved rental income for the City of San Diego.
- O14-10 8. The proposed Master Plan Amendment will result in a net decrease in recreational opportunities and affordable visitor accommodations within the coastal zone. The alternatives studied in the PEIR are more extreme in this regard. Will the public go elsewhere seeking recreational opportunities and potentially overburden other existing coastal resources? Or might the Master Plan Amendment simply result in fewer people having access to coastal resources? Neither

O14-4: This comment recommends that the Amendment and PEIR clarify that vehicular access is contemplated to all areas designated Low-Cost Visitor Guest Accommodations. Please refer to response to comment O14-3. PEIR Chapter 3.0 states that service roads, vehicular access, and parking would be in areas proposed for low-cost visitor guest accommodations, regional parkland, boating, and active recreation. No development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. No revisions to the PEIR are warranted.

O14-5: This comment recommends the following modification to the following sentence in the Hydrology and Water Quality Technical Memorandum (PEIR Appendix I): "A new channel connecting Rose Creek to the De Anza Cove water area would could be constructed at approximately Lilac Drive, creating a new island that would be accessed by two new bridges." This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

O14-6: This comment requests clarification on if the proposed bridges are intended as a means of connecting the island to the mainland to allow water to flow unobstructed from Rose Creek to promote newly created wetlands within and adjacent to De Anza Cove. The proposed bridges are intended to connect the new island to the mainland. No revisions to the PEIR are warranted.

O14-7: This comment states that there is no study that analyzes the impact that silt carried in from Rose Creek will have on De Anza Cove and the potential need for ongoing maintenance and clearing of the channel. PEIR Section, 5.7, Hydrology and Water Quality, states that the project would have the potential to result in long-term operational pollutants associated with components of the project, such as low-cost visitor guest accommodations, parking areas, and street improvements, that would introduce potential pollutants, including sediments, heavy metals, nutrients, trash and debris, oxygen-demanding substances, oil and grease, pesticides, and bacteria and viruses. Due to the project's location within and adjacent to Rose Creek and Mission Bay, the immediate pollutants of concern are those that contribute to the eutrophic conditions at the mouth of the Rose Creek inlet (nutrients) and the high coliform counts along the Mission Bay shoreline. In addition, the expansion and regrading required for wetland restoration could lead to increased erosion.

PEIR Table 5.7-1, Recommended Best Management Practices, provides a preliminary list of recommended best management practices that would be refined and implemented as part of final project design and monitoring programs for future project activities consistent with the project in accordance with the City's Stormwater Standards Manual that requires the preparation of a Stormwater Quality Management Plan. In addition, proposed water quality detention basins would be different sizes and would capture and treat stormwater before it flows into Mission Bay. Water quality detention basins would be designed with a sediment forebay, a

height-appropriate embankment specific for each area of treatment, and a base to reduce sediment and erosion at the outflow. Native plants would be used to reduce sediment and total suspended solids from stormwater. Additional water quality-enhancing features would include vegetated areas bordering all development to reduce stormwater contamination, including debris and sediment, from reaching Mission Bay. Revegetating the edges of Rose Creek and along the “boot” of De Anza Cove with marsh, wetland, and upland native plants would create another water quality-enhancing feature.

Please refer to response to comment O14-3. As described in PEIR Section 1.4.1, GDPs will be developed over time and will provide precise engineering and construction plans for the various elements of the project. Since these plans are currently not available at the planning level, their environmental impacts have been estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements. Once the project design for the low-cost visitor guest accommodation area has been completed and prior to approval, the City will route the project through the Public Project Assessment process, which includes the preparation of the appropriate environmental documentation in accordance with California Environmental Quality Act (CEQA). At that time, specific mitigation measures will be developed based on the site-specific impacts of the proposed design and the mitigation strategy outlined in the PEIR, and items such as the need for on-going maintenance of the channel will be analyzed based on the project-specific design. The City acknowledges that, due to the lack of detail and site design

in the PEIR, many future projects will undergo site-specific CEQA review, which is the appropriate time to evaluate site-specific impacts. No revisions to the PEIR are required.

O14-8: This comment states that the Regional Water Quality Control Board (RWQCB) requests a hydrologic model of the proposed new channel be included in the PEIR, and agrees that such analysis is needed. The comment also provides recommendations for alternatives that provide Rose Creek water to the proposed wetland east of De Anza Cove. The RWQCB Supplemental Environmental Project (SEP) does not discuss or require the preparation of such a hydrologic model as part of the De Anza Natural Amendment PEIR. Please refer to response to comment O14-7. The design of the future proposed channel is not currently available; therefore, preparation of a hydrologic model would be premature. The recommendations identified in the comment would be more appropriate to submit for consideration during future project-level review. No revisions to the PEIR are warranted.

O14-9: This comment states that bridges are costly and recommends that alternative methods be studied to bring water from Rose Creek to De Anza Cove. Please refer to responses to comments O14-3 and O14-7. The recommendations identified in the comment would be more appropriate to submit for consideration during future project-level review. Furthermore, CEQA Guidelines, Section 15131, specifically states that “economic or social effects of a project shall not be treated as significant effects on the environment.” CEQA defines “environment” as “the physical conditions which exist within the area which will be affected by a proposed project, including

land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance” (California Public Resources Code, Section 21060.5). An EIR project analysis is limited to those socioeconomic issues that could result in a direct change to the physical environment. Therefore, the economic cost of the project is not required to be analyzed in the PEIR. No revisions to the PEIR are warranted.

O14-10: This comment states that the PEIR fails to analyze the potential impacts of reduced recreational opportunities for the public and whether inhibiting public access to such coastal resources is consistent with applicable policies. As discussed in PEIR Chapter 3.0, the project would enhance the existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations (RVs and other low-cost camping facilities), active and passive recreational opportunities to enhance public use of the area, and improvements to access to recreational uses. Specifically, the project would replace much of the low-cost visitor guest accommodations offered by Campland and the Mission Bay RV Resort by offering 48.5 acres of new low-cost visitor guest accommodations, which would include a land use for RVs, cabins, or other eco-friendly accommodations. The project also proposes active and passive recreational amenities to include but not be limited to sand volleyball, pickleball, tennis, walking, cycling, athletic fields, and inline/roller skating and a sandy beach area at the northern and western edges of De Anza Cove. The project would improve access to the park areas along the bay shoreline for residents and visitors. The

O14-10
cont.

the Master Plan Amendment nor the PEIR acknowledges this fact. The PEIR fails to analyze the potential impacts of these reduced opportunities for the public and whether inhibiting public access to such coastal resources is consistent with applicable policies.

O14-11

9. CEQA Guideline section 15382 provides, "An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." The PEIR must analyze whether the reduction in recreational opportunities and low-cost visitor accommodations results in an environmental impact.

O14-12

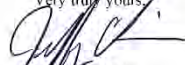
10. An increase in wetlands for bird habitat, reflected in the proposed project, and more dramatically in project alternatives, necessarily will result in an increase in the waterfowl population and, consequently, an increase in waterfowl excrement. Scientific literature and recent studies of Mission Bay demonstrate that waterfowl droppings have an adverse effect on water quality. The PEIR does not study this potential environmental effect of the proposed project or the alternatives and how adverse effects on water quality will impact wildlife and people using the bay, including swimmers and others coming into direct contact with bay water.

O14-13

11. Carbon sequestration as a means to combat climate change is one of the main reasons cited by those who favor the creation of more wetlands at De Anza at the expense of recreational and low-cost visitor accommodations. Addressing climate change is a laudable goal, to be sure. However, in this instance, greater wetland creation comes at the cost of reducing public access to scarce coastal resources – particularly those who can't afford more expensive coastal destinations. There are much more cost-effective ways to sequester carbon than the creation of wetlands, particularly in Mission Bay Park. Additionally, the activities necessary to create wetlands will itself release carbon sequestered in the ground and underwater. These tradeoffs and the value of carbon credits compared to the wetland creation and ongoing maintenance costs are not acknowledged or considered in the PEIR or the Master Plan Amendment. There are undoubtedly more efficient ways to sequester carbon in other parts of San Diego. These alternatives have not been evaluated in the PEIR.

O14-14

We appreciate the ability to comment on these important issues and look forward to your responses.

Very truly yours,

Jeffrey A. Chine

JAC:sn
cc: Michael D. Gelfand
Jacob Gelfand

project includes a multi-use path that would connect the project area to points to the north, west, and east to enhance public equitable access and increase connections to the surrounding communities. Please refer to PEIR Section 5.1, Land Use, and PEIR Appendix B, Land Use Consistency Tables, for the analysis of the project's consistency with applicable policies related to coastal access. No revisions to the PEIR are warranted.

O14-11: This comment states that the PEIR must analyze whether the reduction in recreational opportunities and low-cost visitor guest accommodations results in an environmental impact. Please refer to response to comment O14-10. The proposed habitat area improvements would involve the conversion of the existing Campland property to natural habitat area, as anticipated in the MBPMP. The project would replace much of the low-cost visitor guest accommodations offered by Campland and the Mission Bay RV Resort by offering 48.5 acres of new low-cost visitor guest accommodations, which would include a land use for RVs, cabins, or other eco-friendly accommodations. At the current programmatic level, there is no proposed design for the project; therefore, a comparison of the number of proposed sites and/or future recreational amenities would be speculative. In addition, PEIR Figure 3-1, Site Plan, and PEIR Table 3-2, Proposed Land Use Acreages, in PEIR Chapter 3.0 have been revised in the Final PEIR to ensure no net loss of active recreation use acreage compared to the existing condition. The City will strive to design and phase development of future facilities in a manner that minimizes disruption to active recreation access. Please refer to responses to comments O14-3 and O14-7, which explain the City's GDP process and CEQA

review of future projects. No revisions to the PEIR are warranted.

O14-12: This comment states that the PEIR does not study the potential environmental effect of waterfowl excrement and how its adverse effects on water quality will impact wildlife and people using the bay, including swimmers and others coming into direct contact with bay water. Please refer to response to comment O14-7 related to water quality. No revisions to the PEIR are warranted.

O14-13: This comment states that there are more efficient ways to sequester carbon than the proposed creation of additional wetlands, which are not evaluated in the PEIR. A review of state and federal resources indicates that coastal wetlands are one of the most efficient systems at sequestering carbon from the air into a long term carbon sink. Wetlands have been shown to sequester carbon at much higher rates than terrestrial forests. The Cap-and-Trade program in California (i.e., carbon credits) supports the Greenhouse Gas Reduction Fund which provides funding for projects to assist with the reduction of GHG and carbon sequestration. This program includes funding for wetland restoration and enhancement. Providing carbon sequestration locally has much more benefits to the local ecosystems rather than paying into a program to create or restore wetlands elsewhere. Any redevelopment will theoretically produce additional GHG through construction activities, however, these will be minor compared to the benefits provided by increasing and enhancing wetland area. See response to comment O14-10 regarding the project's effect on public access. The project aims to expand the park's natural habitat and

improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect the City against the risk of climate change and to align the City with the Climate Resilient SD Plan. The proposed habitat area improvements would involve the conversion of the existing Campland property to natural habitat area, as anticipated in the MBPMP since 1994. No revisions to the PEIR are warranted.

O14-14: This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

Comment Letter O15: Coast Law Group on behalf of Audubon Society and Coastal Environmental Rights Foundation, April 20, 2023

O15

From: [Livia Borak Beaudin](#)
To: [PLN_PlanningCEQA](#)
Cc: [Kristen Northrop](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan
Date: Thursday, April 20, 2023 10:26:32 AM
Attachment: [image001.png](#)
[Audubon and CERF Comments - De Anza Natural PEIR.pdf](#)
[Th11.1-11.2-9-921 Staff Report.pdf](#)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

O15-1: This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

O15-1

Please find attached comments on the draft PEIR for the above-referenced project.

Thank you.
~Livia



"Like music and art, love of nature is a common language that can transcend political or social boundaries." – Jimmy Carter



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April 20, 2023

Scott Sandel
 Project Manager
 City of San Diego- Planning Department
 2185 Acero Drive, MS-413
 San Diego, CA 92123

Via Email
 PlanningCEQA@sanidiego.gov

Re: **De Anza Natural Amendment to the Mission Bay Park Master Plan**
Audubon and Coastal Environmental Rights Foundation Comments

Dear Mr. Sandel:

Please accept the following comments on the De Anza Natural Amendment to the Mission Bay Park Master Plan ("Project") on behalf of our clients San Diego Audubon Society ("Audubon") and Coastal Environmental Rights Foundation ("CERF"). Audubon's mission is to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and advocate for a cleaner, healthier environment. To further this mission, Audubon has partnered with the City of San Diego ("City"), state and federal wildlife agencies, State Coastal Conservancy, and the University of California Natural Reserve System to develop ReWild Mission Bay, a project to enhance and restore wetlands in the northeast corner of Mission Bay, creating opportunity for wildlife to thrive and San Diegans to enjoy nature in their own backyard. CLRF is a nonprofit environmental organization founded by surfers in 2008 for the protection and enhancement of California's coastal resources. The purposes of CERF are to aid the enforcement of environmental laws, raise public awareness about coastal environmental issues, encourage environmental activism, and generally act to defend natural resources in coastal areas.

Members of the ReWild Coalition, and in particular Audubon, have been anxiously awaiting the release of the Draft Program Environmental Impact Report ("PEIR"). The inclusion of an alternative which satisfies the settlement of the Regional Water Quality Control Board ("Regional Board") enforcement action was seen as a recognition of the promise of the ReWild alternatives. The Coalition's optimism was misplaced. As detailed below, the PEIR's failure to disclose the extent to which the Wetlands Optimized Alternative complies with the Regional Board Supplemental Environmental Project ("SEP") requirements, the inadequate project objectives and alternatives analysis, and the lack of historical structures analysis threaten to undermine the Mission Bay Park Master Plan ("MBPMP") amendment and the California Environmental Quality Act ("CEQA") review process. To adequately inform the Responsible Agencies, our clients, and the public of the Project's environmental impacts, additional detail

O15-2

O15-3

O15-2: This comment summarizes the mission of the Audubon Society (Audubon) and the Coastal Environmental Rights Foundation (CERF). This comment also states that Audubon has partnered with the City of San Diego (City), state and federal wildlife agencies, State Coastal Conservancy, and the University of California Natural Reserve System to develop ReWild Mission Bay. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR for the project. Therefore, no further response is warranted.

O15-3: This comment states the PEIR fails to disclose the extent to which the Wetlands Optimized Alternative complies with the Regional Board Supplemental Environmental Project (SEP) requirements, the inadequate project objectives and alternatives analysis, and the lack of historical structures analysis threatens to undermine the Mission Bay Park Master Plan (MBPMP) amendment and the California Environmental Quality Act (CEQA) review process and requires additional details on the project's environmental impacts and analysis of the "Wildest" option).

The PEIR identifies a reasonable range of alternatives pursuant to CEQA Guidelines, Section 15126.6. PEIR Chapter 8.0, Alternatives, evaluates four alternatives that would reduce impacts compared to the proposed project (No Project/No Build Alternative, Wetlands Optimized Alternative, Enhanced Wetlands/Optimized Parkland Alternative, and Resiliency Optimized Alternative). The PEIR goes above the requirements of CEQA by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are

compared to the project consistent with CEQA Guidelines, Section 15126.6(b) in accordance with the Regional Water Quality Control Board SEP.

As discussed in PEIR Chapter 3.0, Project Description, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. The CEQA Guidelines contain guidance on when a PEIR may be prepared. As explained in the PEIR, CEQA Guidelines, Section 15168, states that "A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) Geographically, (2) A logical parts in the chain of contemplated actions, (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

To satisfy the requirements of the SEP, a Sea Level Rise Assessment Technical Report (Appendix N) was prepared to demonstrate how 80 acres of additional functional wetlands (low-high salt marsh and mudflat habitat) could persist at year 2100. The Sea Level Rise Assessment Technical Report will inform the future design of the project.

PEIR Section 5.6, Historical, Archaeological, and Tribal Cultural Resources analyzes potential impacts related to historical, archaeological, and Tribal Cultural Resources (TCRs) that could result from the implementation of the proposed project. PEIR Section 5.6 states that currently, no

designated historical resources are within the project area. However, unevaluated resources may be found to be significant and eligible for designation, including the six facilities listed in the section, if project-level site-specific analysis reveals that one or more of these buildings meets the criteria for listing on the National Register of Historic Places, California Register of Historical Resources, or the San Diego Historic Register of Historical Resources. The project envisions conceptual-level improvements to the project area that may result in the alteration or demolition of potentially historic built environment resources, including the Mission Bay RV Resort, De Anza Cove mobile home park, Campland, and Mission Bay Boat and Ski Club. While the City's Municipal Code provides for the regulation and protection of designated and potential historical resources, it is not possible to ensure the successful preservation of all historic built environment resources within the project area at a programmatic level. Although specific detailed development is not proposed at this time, future implementation and related construction activities facilitated at the project level could result in the alteration of a historic building, structure, object, or site. Direct impacts of specific future projects may include substantial alteration, relocation, or demolition of historic buildings, structures, objects, sites, and districts. Indirect impacts may include the introduction of visual, audible, or atmospheric effects that are out of character with a historic property or alter its setting when the setting contributes to the resource's significance. PEIR Section 5.6 concluded that even with the application of the existing regulatory framework and mitigation framework that would avoid future project-level impacts, the feasibility and efficacy of mitigation measures cannot be determined

at this program level of analysis. Therefore, after implementation of feasible mitigation measures, impacts to prehistoric and historic archaeological resources, sacred sites, and human remains would remain significant and unavoidable.

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) identifies a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. Chapter 8.0 evaluates four alternatives that were selected for additional analysis; in addition, Chapter 8.0 identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative that were considered but rejected for their failure to meet the project objectives. The rationale for eliminating each alternative is provided in Chapter 8.0.

The MBPMP calls for a “balanced approach” with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project proposes 146.5 acres of active recreation, regional parklands, open beach,

boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

The "Wild" and "Wildest" alternatives would not fully consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5) because they lack sufficient site areas for a balance of land uses, including enough site area for recreation and low-cost visitor guest accommodation, and as a result, they would also not provide enough equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access (project objective 1). The "Wilder" and "Wildest" alternatives would also fail to meet project objective 5 because they would reduce the amount of area available for aquatic recreation uses, such as the enjoyment of open beach sand activities and boating.

Therefore, while all three of these alternatives would identify environmental uses, they would not consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5). These alternatives would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2) as the project would, and while these alternatives would provide bike and pedestrian pathways, they would not prioritize public access and connectivity to the extent that the project would, or activation of the shoreline (project objective 6). The three ReWild alternatives would not enhance public access or provide equitable access to De Anza Cove because of how those

O15-3
cont.

(including an analysis of the "Wildest" option) is required.

A. Water Quality Must Be the Foremost Consideration

The Project includes the De Anza Special Study Area ("SSA"), which is a critical component of the City's restoration and water quality improvement efforts:

The SSA shall not be developed to the detriment of existing and/or future adjacent habitat areas. **Foremost in consideration should be the extent to which the SSA can contribute to the Park's water quality.** In fact, additional wetlands creation must be considered as part of the SSA.

The SSA should facilitate the implementation of hydrologic improvements aimed at safeguarding the viability of marsh areas in its vicinity.

O15-4

Thus, the Project's foremost consideration should be water quality improvement and habitat creation to further the MBPMP goals. The PEIR Project objectives do not reflect this reality. Of the six project objectives, the fourth is arguably *related to water quality*, but it does not prioritize water quality as envisioned in the City Charter, MBPMP, Natural Resource Management Plan ("NRMP"), or SEP.

"It is broadly recognized that [Mission Bay] Park's economic and recreational future depends on the quality of the Bay's water." Water quality in Mission Bay is impaired in numerous locations, including the Rose Creek outfall, De Anza Cove, and at the Campland shoreline.² Notably, bacteria is the highest priority water quality condition in the Mission Bay Watershed Management Area and is especially problematic for the eastern portion of Mission Bay.³ By introducing more development into Mission Bay, the Project has the potential to exacerbate these impairments. The Mission Bay Natural Resources Management Plan emphasizes that continuous efforts should "be made to improve water quality for preserve areas and the Bay."⁴ In addition, future changes to stream flows (including Rose Creek) are to consider the natural resource management policies in Mission Bay Park.⁵ Wetlands are particularly effective in treating sediment, another pollutant of concern,⁶ and bacteria.

The City Charter also reflects the prioritization of water quality and habitat in Mission Bay Park. Section 55.2(c) directs Mission Bay Park Improvement Funds to be expended to, among other things, restore wetlands, wildlife habitat, and other environmental assets within the Mission Bay Park Improvement Zone. The Charter further prioritizes "[w]etland expansion and

¹ MBPMP, Land Use, p. 58, emphasis added.

² Mission Bay Water Quality Improvement Plan, p. 2-13.

³ *Id.*, p. v; Natural Resource Management Plan ("NRMP"), p. 22.

⁴ NRMP, p. 50.

⁵ NRMP, p. 50.

⁶ Mission Bay Water Quality Improvement Plan, p. 4-41; NRMP, p. 26.



plans laid out the habitat design to reduce access to the cove's shorelines compared to the project. Therefore, while these alternatives would meet project objectives 3 and 4 by incorporating climate adaptation strategies and embracing responsibility and stewardship of the environment, they would not meet most of the project objectives. Thus, they have been eliminated from further consideration. No revisions to the PEIR are warranted.

O15-4: This comment states that the project objectives do not consider water quality and habitat creation as envisioned in the City Charter, MBPMP, Natural Resource Management Plan, or SEP. It further states that the flawed project objectives lead to a cascade of issues. Appendix B of the PEIR provides an analysis of the project's consistency with the goals and objectives of the MBPMP and the City's General Plan. Specifically, the project would promote MBPMP policies that support the expansion of open space by removing Campland on the Bay (Campland) and replacing it with a natural habitat area contiguous with the existing Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP). The project would sustain and enhance the biodiversity of the KFMR/NWP and expand natural habitat areas contiguous to this existing preserve, which would improve water quality. The expanded marshland/habitat area would be composed of high-, mid-, and low-salt marsh areas, mudflats, and subtidal areas, creating a natural interface with De Anza Cove and enhancing water quality in the bay. As further discussed in PEIR Section 5.1, Land Use, the proposed change in land use related to the demolition of Campland would maximize the benefits of habitat areas by placing them in large contiguous sites in compliance with the Natural Resource Management Plan.

An EIR must include a clearly written statement of objectives that includes the underlying purpose of the project. The project objectives listed in PEIR Chapter 3, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Chapter 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan.

The project includes water quality design features that are proposed along the edges of the active recreational areas. The proposed water quality detention basins would be of differing sizes and would capture and treat stormwater before flowing into Mission Bay. New water quality basins would be located to treat the entire project area in accordance with local and state requirements.

The water quality detention basins would be designed with a sediment forebay, a height-appropriate embankment specific for each area of treatment, and a base of the basin to reduce sediment and erosion at the outflow. Native plants would be used to reduce sediment and total suspended solids from stormwater. Additional water quality-enhancing features would include vegetated areas bordering all development areas to further reduce stormwater contamination, including debris and sediment, from reaching Mission Bay.

In addition to water quality detention basins, the project would incorporate site-specific best management practices (BMPs) to enhance water quality. These BMPs would include native

water quality improvements and the protection and expansion of eelgrass beds as identified in the Mission Bay Park Master Plan.¹²

This emphasis on water quality is of particular interest to a Responsible Agency, the Regional Board. With its approval of the “Resolution To Support Restoration Of Aquatic Ecosystems In The San Diego Region” and more recently the Northeast Mission Bay Wetland Restoration SLP, the Regional Board has consistently stressed the importance of the Project area to water quality and wetlands.

To minimize impacts and maximize resources, the MBPMP focuses habitat restoration efforts in the Project area. “To maximize their recreational and biological functions, the ‘natural’ areas of the Park are proposed in the northeast quadrant of the Park where they can benefit from optimum contiguity.”¹³ Within the PEIR, however, the priorities specific to the Project area are supplanted by vague and overboard aspirations more appropriate for the broader Mission Bay Park. As detailed below, the flawed project objectives lead to a cascade of issues, including: (1) the objectives do not lend themselves to development of a reasonable range of alternatives; (2) the PEIR’s rejection of all the ReWild options is unsupported and conclusory; and (3) the alternatives do not result in a true reduction of significant impacts.

1. The Project Objectives Are Overboard, Vague, and Pretextual

As the City noted in its SEP application,

The restoration of wetlands in Mission Bay provides a unique opportunity to reclaim areas of development and restore coastal wetlands that will provide numerous benefits such as sea level rise resiliency, water quality improvements and enhancement of native plant and animal populations. A wetland restoration project of this size and magnitude with significant environmental and community benefits is of special interest to numerous stakeholders including federal and state agencies, non-profit organizations, the City of San Diego and the visitors and residents of San Diego County. This project supports an evolving perspective on the value of coastal wetlands, transitioning from an entirely recreation focused resource value to a mixed-use resource that reclaims lost wetland areas and provides a cleaner, safer and more environmentally enriching experience that reflects the progressive values of San Diego and our long-term commitments to natural resources in the future.¹⁴

In lieu of paying a penalty for a Clean Water Act violation, the City used hundreds of thousands of dollars to study an alternative filled with promise. In its SEP application, the City

¹² City Charter Section 55.2(c)(1)(B).

¹³ MBPMP, Land Use, p. 45.

¹⁴ Id. at pp. 4-5.



O15-4
cont.

O15-5

plants for landscaping, which would not require fertilizers to reduce the potential for added nutrients into nearby water bodies, as well as efficient irrigation practices to reduce nutrient runoff. The project would incorporate storm drainage signage featuring a statement such as “NO DUMPING” or “DRAINS TO OCEAN” to discourage illegal dumping by visitors.

As a further water quality-enhancing feature, the edges of Rose Creek and along the “boot” of De Anza Cove would be revegetated with marsh, wetland, and upland native plants. Therefore, the PEIR adequately addresses water quality, and no revisions are warranted.

O15-5: This comment states that the PEIR does not provide sufficient evidence that the ReWild alternatives are infeasible. Please refer to response to comment O15-3. In addition, this comment states that the PEIR objectives do not align with the SEP or the MBPMP and it is not clear how the project fosters opportunities for members of local Tribal nations to connect to De Anza Cove. As discussed in PEIR Section 5.6.3.3, Issue 3: Tribal Cultural Resources, Tribal consultation in accordance with Assembly Bill 52 was conducted in 2019 with the Jamul Indian Village and the Lipay Nation of Santa Ysabel. Additional Tribal consultation pursuant to Assembly Bill 52 was also conducted in April 2023. Please refer to response to comment O15-4 regarding the project objectives. As identified in PEIR Chapter 3.0, the intent of expanding the wetlands is to provide a natural environment for recreation, mitigate for other disturbed environments, and benefit wildlife. In addition, the project would include an Interpretive Nature Center, which would foster opportunities for members of local Tribal nations to reconnect to De Anza Cove.

O15-5
cont.

lured regulators and NGOs alike with powerful prose: an evolving perspective on the value of coastal wetlands; transitioning from an entirely recreation focused resource value to a mixed-use resource that reclaims lost wetland areas and provides a cleaner, safer, and more environmentally enriching experience that reflects the progressive values of San Diego and our long-term commitments to natural resources in the future. In the PEIR, the City casts its progressive values aside, grasping for evidence that the ReWild alternatives are infeasible. Instead, the PEIR incorporates six broad objectives that do not align with the SEP or MBPMP. Indeed, it is unclear how the Project or any of the PEIR alternatives achieve several of the project objectives, such as fostering opportunities for members of local Tribal nations to connect to De Anza Cove.

Because the objectives are overly broad and vague, they serve as a pretext for an adequate basis to reject the ReWild alternatives. In short, the PEIR's analysis of the ReWild alternatives is conclusory and unsupported.

2. The PEIR Impermissibly Rejected the ReWild Alternatives

"A potentially feasible alternative that might avoid a significant impact must be discussed and analyzed in an EIR so as to provide information to the decision makers about the alternative's potential for reducing environmental impacts. Without analysis, the theory posited by the City... is purely speculative and is not supported by any facts discussed in the draft EIR or the final EIR."¹⁰ Here, the PEIR rejects the ReWild alternatives for their failure to meet project objectives. However flawed those objectives may be, the ReWild alternatives nonetheless meet them.

O15-6

The PEIR claims the ReWild alternatives "do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders."¹¹ The fifth project objective is to diversify active and passive recreational uses that will serve a range of interests, ages, activity levels, incomes, and cultures both on land and in water. It is not to balance uses requested by various stakeholders (such as Campland and Mission Bay RV Resort). Contrary to the PEIR's bare assertion, Wild and Wildest alternatives could provide enough areas for recreation and low-cost visitor guest uses.

Wetlands provide an opportunity for public access, engagement, recreation, education, and enjoyment. As the Project website acknowledges, the first goal of the Project is to "[e]xpand wetlands for both habitat and for public enjoyment."¹² Mission Bay Park has 27 miles of shoreline, 19 miles of sandy beaches and eight official swimming areas but no accessible tidal

¹⁰ *Habitat & Watershed Caretakers v. City of Santa Cruz* (2013) 213 Cal.App.4th 1277, 1304; see also, *Laura Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 405, ["An EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project"].

¹¹ PEIR, p. 8-4.

¹² <https://www.sandiego.gov/planning/work/park-planning/de-anza>



O15-6: This comment states that the PEIR's rejection of the ReWild alternatives is unsupported because the objectives are overly broad and vague. The comment then provides the commenter's assessment of how the ReWild alternatives meet the project objectives. Please refer to response to comment O15-3 and O15-4.

O15-6
cont.

marsh habitat.¹³ The MBPMP acknowledges the increased wildlife habitat would provide the setting for “nature-oriented recreational activities such as bird-watching and canoeing.”¹⁴ It also acknowledges a majority of San Diego residents would like to experience Mission Bay in a more natural condition and an extraordinary public demand for “preservation and enhancement of natural resources.”¹⁵ This unique habitat would not only enable diverse recreational uses (such as education, spiritual connection and enjoyment, scientific study, bird watching, biking, paddle-boarding, kayaking, walking, fishing, and aesthetic enjoyment) but would serve a much wider range of interests, ages, activity levels, incomes, and cultures than the selected Project.

Passive low-cost visitor accommodations such as camping are also consistent with the ReWild alternatives and would enable greater public access to Mission Bay Park. In contrast, historical commercial uses at Campland and De Anza Cove (most recently the Mission Bay RV Resort) serve to exclude the majority of the public in exchange for commercial gain. Though missing from the PEIR’s project objectives, the Project website reveals the City’s desire to generate revenue from its leaseholds.¹⁶ This omission is likely due to the blatant inconsistency between the revenue-generating leases and the MBPMP: “It is not the objective of this Plan, however, to expand dedicated lease areas to the detriment of the public use of the land.”¹⁷ Mission Bay Park receives an estimated 15 million annual attendees. Public access to the Park should therefore be prioritized over profits.

Similarly, the PEIR claims Wild and Wildest cannot meet project objective one because they do not provide enough equitable access to De Anza Cove and the coastal landscape. Again, Campland and Mission Bay RV Resort have actively discouraged and restricted public access. In contrast, Wild and Wildest provide the “safer and more environmentally enriching experience that reflects the progressive values of San Diego and our long-term commitments to natural resources in the future.”

The PEIR also summarily discounts Wild and Wildest’s ability to meet project objective two, to “foster opportunities for members of local Tribal nations to reconnect to De Anza Cove.” The PEIR provides no support for this conclusion:

The EIR must contain facts and analysis, not just the bare conclusions of a public agency. An agency’s opinion concerning matters within its expertise is of obvious value, but the public and decision-makers, for whom the EIR is prepared, should also have before them the basis for that opinion so as to enable them to make an

¹³ <https://www.sandiego.gov/park-and-recreation/parks/regional/missionbay>

¹⁴ MBPMP, Executive Summary, p. 4.

¹⁵ *Id.* at Executive Summary, pp. 9-10.

¹⁶ <https://www.sandiego.gov/planning/work/park-planning/de-anza> (“Project Goals”)

¹⁷ MBPMP, Executive Summary, p. 3.



independent, reasoned judgment.¹⁸

An interpretive nature center where Tribal stories and traditions can be shared (presumably to non-Tribal members) would acknowledge the history and significance of the Project area without actually providing opportunities for Tribal nations to connect to the area. In contrast, the ReWild Coalition's members' discussions with Tribal partners have shown that local Tribal nations want space to reconnect to tidal habitat.

The Project also claims to "recognize the history and ancestral homelands of the Lipay-Lipay Kunneyaay people, providing opportunities to partner and collaborate on the planning and restoration of the area."¹⁹ However, the time to partner with Tribal nations is now – not after the MBPMP is amended and the Project approved. Nothing in the PEIR supports the City's bare assertion that the Project achieves the stated objective and the Wild and Wildest options do not.

The sixth objective is to "[e]nhance public access and connectivity within De Anza Cove, and increase connections to the surrounding communities, including opportunities for multimodal travel."²⁰ Again, the existing fences at Campland and Mission Bay RV Resort have restricted public access, resulting in Coastal Commission enforcement action and \$1 million in fines. Private visitor accommodations have thus been a hindrance to the Project's stated sixth objective. To enhance public access and connectivity, including opportunities for multimodal travel including cyclists, canoers, kayakers, skaters, and pedestrians, the Project should provide more public access – not revenue-generating commercial spaces with unenforced public access provisions.

Lastly, the PEIR claims the MBPMP prescribes a 200-foot buffer from Rose Creek.²¹ The MBPMP calls for a 100-foot buffer.²² Nonetheless, the ReWild alternatives could provide the appropriate buffer, as reflected in the plans.²³

In summary, the PEIR's rejection of the ReWild alternatives is unsupported despite the PEIR's reliance on pretextual objectives.

3. The PEIR Fails to Analyze a Reasonable Range of Alternatives

"The core of an EIR is the mitigation and alternatives sections. The Legislature has declared it the policy of the State to 'consider alternatives to proposed actions affecting the

¹⁸ *Savidge County Water Dist. v. County of Orange* (1981) 118 Cal.App.3d 818, 831; *Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935.

¹⁹ See, e.g., PEIR, p. 5-2.

²⁰ PEIR, p. 8-4.

²¹ MBPMP, and U&E, p. 60.

²² <https://rewildmissionbay.sma.wps-content.com/2019/01/missionbay-rewild-plan-interior-15.pdf> (reflecting Passive and Active Recreation with Appropriate Buffer).



O15-7: This comment states that the PEIR fails to include a reasonable range of alternatives. The PEIR identifies a reasonable range of alternatives pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15126.6, which states that "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason."

The selection of alternatives evaluated in PEIR Chapter 8.0: Alternatives is governed by a "rule of reason" that requires an EIR to evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. As discussed in PEIR Chapter 8.0: Alternatives, the alternatives included in the analysis were

O15-7
cont.

environment.²³ Therefore, CEQA requires an evaluation of alternatives that meet most of the Project objectives and reduce or eliminate significant impacts.²⁴ The PEIR found the Project will result in impacts to:

1. Biological Resources
2. Hazards and Hazardous Materials
3. Historical, Archaeological, and Tribal Cultural Resources; and
4. Noise (Construction)

O15-8

In addition to the No Project alternative, the PEIR analyzed three alternatives and rejected as infeasible all of those advanced by the ReWild coalition. As noted in Table 8-6, none of the selected alternatives (other than the No Project) would reduce the one significant impact to a level of insignificance.²⁵ The only significant impact that is reduced, although it remains significant, is the impact to historical, archeological, and tribal cultural resources.²⁶ All other impact areas are less than significant or less than significant with mitigation. In addition, the three selected alternatives are otherwise virtually identical in terms of their impact. Thus, the PEIR's selection of alternatives has less to do with significance and more to do with the City's land use preference.

O15-9

The pertinent finding of significance is premised on an assumption that historic structures over 45 years old *might* constitute historical resources.²⁷ Purportedly because an in-depth analysis now "may become outdated at the time of implementation of any particular component of the project," the PEIR defers evaluation of the structures' actual historical significance and simply presumes impacts would occur.²⁸ This is inappropriate where such analysis is not only feasible,²⁹ but also critical as this is the one and only impact area which sets the alternatives apart. "Designating an EIR as a program EIR ... does not by itself decrease the level of analysis otherwise required in the EIR" and the "level of specificity of an EIR is determined by the nature of the project and the 'rule of reason' rather than any semantic label accorded to the EIR."³⁰ Tiering does not excuse the lead agency from adequately analyzing reasonably foreseeable

²³ *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564-565.

²⁴ See Pub. Res. Code §21002, 21081; CEQA Guidelines §15126.6 (a) [1] "... An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.]"

²⁵ PEIR, p. 8-58.

²⁶ Id.

²⁷ See PEIR, p. 8-47 [finding Enhanced Wetland/Optimized Wetland alternative would result in reduced impacts because it would seek to retain **potentially** historic structures over 45 years old]

²⁸ PEIR, p. 5.6-5-6; 5.6-16 [potential impacts to historic buildings, structures, objects, and/or sites would be significant and unavoidable.]

²⁹ See Appendix H: City's Historical Resources Guidelines, p. 25; PEIR, p. 4-35.

³⁰ *Cleveland National Forest Foundation v. San Diego Ass'n. of Governments* (2017) 17 Cal.App.5th 413, 426.



developed in the course of project planning, environmental review, and public input. The alternatives chosen for analysis within the Draft PEIR provide a range of reasonable alternatives that would avoid or substantially lessen environmental impacts as required by law. Thus, no further alternative scenarios are required to be presented and/or analyzed.

O15-8: This comment states that the PEIR's selection of alternatives has less to do with significance and more to do with the City's land use preference. Please refer to response to comments O15-3 and O15-7.

O15-9: This comment states that the PEIR defers evaluation of historical significance and presumes impacts would occur and states the City is obligated to disclose what it reasonably can about these structures. Please refer to response to comment O15-3 that discusses Historical Resources which are assumed to be potentially significant in the PEIR. As discussed in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. It is currently unknown if or when on-site structures would be modified because project-specific development plans and design are not available.

The CEQA Guidelines contain guidance on the Tiering process. As stated in CEQA Guidelines Section 15162.c, "Where a lead agency is using the tiering process in connection with an EIR for a large-scale planning approval, such as a general plan or component thereof (e.g., an area plan or community plan), the development of detailed,

site-specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of a more limited geographical scale, as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand.”

CEQA Guidelines Section 15146 also defines the degree of specificity necessary in an EIR: “The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.” An EIR for a project such as the adoption of a Master Plan Amendment should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow. The PEIR does not serve as project-level environmental analysis for any specific development project and adequate information is not available at this time to address potential future site-specific impacts of the proposed project. The mitigation framework provided in the PEIR is adequate for program-level environmental review of the project and does not defer mitigation of historical impacts. The PEIR acknowledges that the City will evaluate future detailed GDPs for future projects as they are developed. A GDP, as defined in City Council Policy 600-33, is a Conceptual Master Plan that identifies the activities and amenities to be included in a park. As described in PEIR Section 1.4.1, Type of PEIR, GDPs will be developed over time and will provide precise engineering and construction

significant environmental impacts of the project and does not justify deferring such analysis to a later tier EIR or negative declaration.³¹

“When the failure to comply results in a subversion of the purposes of CEQA by omitting information from the environmental review process, the error is prejudicial.”³² Simply labeling the impact significant without providing the public and decision-makers with the requisite information is indefensible. Indeed, the PEIR states all of Campland, all of the Mission Bay RV Resort, the Pacific Beach and Tennis Club, the De Anza Mobile Home Park, including the homes and administration building, and the Mission Bay Boat and Ski Club *might* all be historic resources.³³ The City is obligated to disclose what it reasonably can about the historical significance of these structures.³⁴ The PEIR’s approach has the process exactly backward and allows the lead agency to travel the legally impermissible easy road to CEQA compliance.

Before one brings about a potentially significant and irreversible change to the environment, an EIR must be prepared that sufficiently explores the significant environmental effects created by the project. The EIR’s approach of simply labeling the effect “significant” without accompanying analysis of the project’s impact on [historic resources] is inadequate to meet the environmental assessment requirements of CEQA.³⁵

The uniformity of impacts among the alternatives is a direct result of the City’s flawed project objectives. Compounding the error, the PEIR focuses on a significant impact that may not actually be significant (or as significant) to differentiate among the alternatives and select the environmentally superior alternative. Until the City revises its objectives to focus on the SSA-specific goals of the MHPMP and sufficiently explores the impacts to historical resources, the PEIR will remain inadequate.

B. The Project Is Inconsistent with the SEP and Will Exacerbate Coastal Squeeze

The PEIR fails to provide any sea-level rise analysis, which in turn precludes an assessment of the Project’s exacerbation of coastal squeeze³⁶ and PEIR’s consistency with the

³¹ CEQA Guidelines, § 15152(b); *Fineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 431.

³² *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 734.

³³ PEIR, p. 5.6-4.

³⁴ *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 17 Cal.App.5th 413, 441.

³⁵ *Berkeley Keep Jaks Over the Bay Committee v. Board of Port Combs* (2001) 91 Cal.App.4th 1344, 1371.

³⁶ Coastal squeeze is the loss of natural habitats or deterioration of their quality arising from anthropogenic structures or actions, preventing the landward transgression of those habitats that would otherwise naturally occur in response to sea level rise in conjunction with other coastal processes. Coastal squeeze affects habitat on the seaward side of existing structures.



O15-9
cont.

O15-10

O15-11

plans for the various elements of the project. Since these plans are currently not available at the planning level, their environmental impacts have been estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements. City Council Policy 600-33 outlines the public participation process for the development of future GDPs. A public workshop is required to provide details of the project, including proposed scope, schedule, cost, and related information and would discuss the necessary steps for project review and approval. Once the project design has been finalized and prior to approval, the City will route the project through the Public Project Assessment process, including the preparation of the appropriate environmental documentation in accordance with CEQA. At that time, specific mitigation measures will be developed based on the site -specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. The City also acknowledges that, due to lack of detail and site design in the PEIR, many future projects will undergo site-specific CEQA review, which is the appropriate time to evaluate site-specific impacts. Therefore, the historical resources are adequately analyzed in the PEIR, and no revisions to the PEIR are warranted.

O15-10: This comment states that the PEIR focuses on flawed project objectives and on a significant impact that may not actually be significant (or as significant) to differentiate among the alternatives and select the environmentally superior alternative. The project’s objectives, which are defined in PEIR Chapter 3.0: Project Description, explain the underlying purpose of the project and are used to develop a reasonable range of alternatives in line with the requirements of CEQA Guidelines Section 15124.

Please refer to responses to comments O15-3 and O15-9 regarding the PEIR’s historical resource significance

determination. As discussed in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. The CEQA Guidelines contain guidance on when a PEIR may be prepared. As explained in the PEIR, CEQA Guidelines Section 15168 states that "A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) Geographically, (2) A logical parts in the chain of contemplated actions, (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways." CEQA Guidelines, Section 15146, defines the degree of specificity necessary in an EIR: "The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." An EIR for a project such as the adoption of a Master Plan Amendment should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow. The PEIR does not serve as project-level environmental analysis for any specific development project and adequate information is not available at this time to address potential future site-specific impacts of the proposed project. The mitigation framework provided in the PEIR is adequate for program-level environmental review of the project and does not defer mitigation of historical impacts. No revisions to the PEIR are warranted.

O15-11 cont. Northeast Mission Bay Wetland Restoration SEP. Therein, the City promised that its expanded wetland alternative would "result in the establishment of 80 acres of additional functional wetlands (low-mid-high wetland/salt marsh and mudflats), in addition to the Kendall-Frost Marsh/Northern Wildlife Preserve, at the Year 2100 based on current models utilized by the City for sea level rise projections."³⁷

The Project website also claims the MBPMP amendment "recognizes the benefits of wetlands" and has taken into account the sea level rise modeling developed by USGS. Again, the PEIR fails to disclose this analysis or provide the results thereof. The loss of wetland habitat and threat to the many species that rely on them is not simply conjecture. If habitat is not properly located, the historical destruction of wetlands in Mission Bay will be further exacerbated by the Project.

O15-12 As in much of Southern California, wetlands in Mission Bay have been drastically altered and destroyed over the past 200 years. Approximately 5 percent of the historic estuarine ecosystem (i.e., salt marsh, mudflat, salt panne) in Mission Bay remain today. This systemwide destruction has left much of Mission Bay without the functional benefit of wetlands to provide sediment trapping, nutrient uptake, and habitat/cover for native biota. **Anticipated sea level rise poses a significant threat to the remaining wetlands, since little transitional habitat is available for migration. The project area is the most likely area in Mission Bay where wetlands and their associated ecosystem processes can be recovered.**³⁸

O15-13 Notwithstanding the City's SEP commitments, the PEIR fails to provide the information necessary to assess the Project's consistency therewith. Indeed, the ESA Memorandum accompanying the ReWild Coalition comments concludes the Project (including the Wetlands Optimized Alternative) is *inconsistent* with the SEP requirement to provide 80 acres of wetlands in 2100.

O15-14 The PEIR should also consider the extent to which the Project could exacerbate the effects of sea level rise by contributing to coastal squeeze and thwarting wetland migration.³⁹ When "a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users."⁴⁰ Locating visitor accommodations and related infrastructure in areas subject to

³⁷ Order R9-2020-0150, Attachment B, p. 6, available at https://www.waterboards.ca.gov/sandiego/water_issues/programs/compliance/docs/acts/R9-2020-0150/R920200150_Attach_B.pdf

³⁸ R9-2015-0041, Resolution To Support Restoration Of Aquatic Ecosystems In The San Diego Region, Attachment I, p. 5, available at https://www.waterboards.ca.gov/sandiego/board_decisions/adopted_orders/2015/R9-2015-0041.pdf

³⁹ *Citizens' Committee to Complete the Refugee v. City of Newark* (2021) 74 Cal.App.5th 460, 477.

⁴⁰ *California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369, 377.



O15-11: This comment states that the PEIR fails to provide any sea-level rise analysis. A Sea Level Rise Assessment Technical Report has been prepared for the project and incorporated into the Final PEIR as Appendix N. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise scenario.

O15-12: This comment states that the PEIR does not incorporate sea level rise modeling developed by USGS. A Sea Level Rise Assessment Technical Report has been prepared for the project and incorporated into the Final PEIR as Appendix N.

O15-13: This comment states that the ESA Memorandum accompanying the ReWild Coalition comments concludes the project is inconsistent with the SEP requirement to provide 80 acres of wetlands in 2100. Please refer to response to comment O15-11 regarding the sea level rise assessment prepared for the project. Responses to comments in the ReWild Coalition letter are provided in comment letter O21.

O15-14: This comment states that the project will exacerbate the effects of sea level rise by contributing to coastal squeeze and thwarting wetland migration. The proposed project would not exacerbate the effects of sea level rise. Please refer to response to comment O15-11 regarding the sea level rise assessment prepared for the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for

the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise scenario.

The comment also states that locating visitor accommodations and related infrastructure in areas subject to inundation will negatively impact water quality. PEIR Section 5.7, Hydrology and Water Quality, discloses that the project would have the potential to result in long-term operational pollutants associated with components of the project, such as guest accommodations, parking areas, and street improvements that would introduce potential pollutants, including sediments, heavy metals, nutrients, trash and debris, oxygen-demanding substances, oil and grease, pesticides, and bacteria and viruses. Due to the project's location within and adjacent to Rose Creek and Mission Bay, the immediate pollutants of concern are those that contribute to the eutrophic conditions at the mouth of the Rose Creek inlet (nutrients) and the high coliform counts along the Mission Bay shoreline. In addition, the expansion and regrading required for wetland restoration could lead to increased erosion.

PEIR Table 5.7-1, Recommended Best Management Practices, provides a preliminary list of recommended BMPs and would be refined and implemented as part of final project design and monitoring programs for future project activities consistent with the project in accordance with the City's Stormwater Standards Manual that requires the preparation of a Stormwater Quality Management Plan (SWQMP). In addition, proposed water quality detention basins would be of differing sizes and would capture and treat stormwater before flowing into Mission Bay. Water

quality detention basins would be designed with a sediment forebay, a height-appropriate embankment specific for each area of treatment, and a base to reduce sediment and erosion at the outflow. Native plants would be used to reduce sediment and total suspended solids from stormwater. Additional water quality-enhancing features would include vegetated areas bordering all development to reduce stormwater contamination, including debris and sediment, from reaching Mission Bay. Revegetating the edges of Rose Creek and along the “boot” of De Anza Cove with marsh, wetland, and upland native plants would create another water quality-enhancing feature.

As described in PEIR Section 1.4.1, Type of PEIR, General Development Plans (GDP) will be developed over time and will provide precise engineering and construction plans for the various elements of the project. Since these plans are currently not available at the planning level, their environmental impacts have been estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements. Once the project design has been finalized and prior to approval, the City will route the project through the Public Project Assessment process, including the preparation of the appropriate environmental documentation in accordance with CEQA. At that time, specific mitigation measures will be developed based on the site-specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. The City also acknowledges that, due to lack of detail and site design in the PEIR, many future projects will undergo site-specific CEQA review, which is the appropriate time to evaluate site-specific impacts. No revisions to the PEIR are warranted.

O15-14
conf. | inundation will negatively impact water quality and result in coastal squeeze. A De Anza development footprint that fails to appropriately account for sea level rise may jeopardize adaptation and wetland expansion efforts in both the SSA and the adjacent reserve, failing to safeguard the "viability of marsh areas in [the SSA] vicinity."⁴¹

O15-15 | An expanded preserve system is needed to "counterbalance the negative impact of a progressively urban influence and future threat of rising sea levels."⁴² Because the Project has the potential to negatively impact existing preserve areas and exacerbate existing Mission Bay water quality issues, transitional habitat is necessary to mitigate such impacts and ensure MIBMP consistency. Without the requisite sea level rise analysis, the PEIR fails to disclose such potential impacts.

C. Campland and Mission Bay RV Resort Do Not Further the Project Objectives

O15-16 | In the fall of 2021, the California Coastal Commission levied a fine against Campland on the Bay and Mission Bay RV Resort for restricting public access to the public tidelands, parking areas, and beaches of Mission Bay.⁴³ These two facilities (operated by related entities) have a combined 110 acres of land and 11.5 acres of water space at their disposal. They are more expensive than nearby public campgrounds and raise their rates on holidays. The base cost of renting a campground space at Campland is over three times the cost of San Elijo State Beach in Cardiff.⁴⁴ The cost of an RV space at the Mission Bay RV Resort is double the cost of the nearby Silver Strand State Beach RV campground in Coronado.⁴⁵ The Coastal Commission staff report noted these rates are "relatively high" and therefore restricting coastal access to those who could afford such rates is a matter of environmental justice.⁴⁶ The California Coastal Conservancy has similarly noted that RVs require an initial investment that makes them less appealing than camping, cabins, dorms and hotel/motel rooms in which there is a robust interest.⁴⁷ To classify these commercial enterprises as low-cost visitor accommodations is therefore tenuous.

Further, as the Commission aptly noted:

While commercial businesses and people who can afford to patronize those businesses benefit from private development fronting Mission Bay and our coast generally, those that do not have these means and/or live far from the coast

⁴¹ Mission Bay Ltd. Master Plan, p. 58.

⁴² NRMMP, p. 54.

⁴³ See Consent Case and Desist Order No. CCC-21-CD-01 Staff Report, enclosed herewith.

⁴⁴ *Id.*, p. 5.

⁴⁵ *Id.*

⁴⁶ *Id.*

⁴⁷ *Explore the Coast Overnight, Expanding Opportunities for All Californians to Stay on the Coast*, March 2019, California Coastal Conservancy, p. 17, available here

<https://ccc.ca.gov/files/2019/10/Explore-the-Coast-Overnight-Assessment-184343.pdf>



O15-15: This comment states that the PEIR fails disclose impacts to the existing preserve areas and Mission Bay water quality. PEIR Section 5.3, Biological Resources, analyzes potential impacts related to biological resources that could result from implementation of the proposed project. Specifically, PEIR Section 5.3.3.2, Issue 2: Sensitive Habitats, concluded that implementation of the project, including restoration of marshland habitat within existing disturbed land and enhancement and hydrologic restoration activities in the KFMR/NWP, could potentially result in direct impacts to southern coastal salt marsh, salt panne, mudflats, eelgrass beds, open water, tidal channel, Diegan coastal sage scrub, southern foredunes, and disturbed land that occurs in the KFMR/NWP. Implementation of marshland and hydrologic restoration activities that result in impacts to southern coastal salt marsh, salt panne, mudflats, open water, or tidal channels, which are all considered wetlands by the San Diego Biological Guidelines (SDBG), are considered potentially significant without mitigation. Similarly, southern foredunes (Tier I) and Diegan coastal sage scrub (Tier II) are considered sensitive vegetation communities by the SDBG, and impacts would be potentially significant. The PEIR concluded that implementation of Mitigation Measures MM BIO 5.3-2 through BIO 5.3-5 would reduce potential direct impacts to sensitive vegetation communities to below a level of significance through monitoring by a qualified biologist, adhering to required mitigation ratios for acreage impacts, and creating and restoring impacted vegetation communities. As future site-specific projects come forward, project-level specific analysis would be required during the design and review

receive the burdens associated therewith.⁴⁸

Thus, continued commercial leasing of Mission Bay park public trust tidelands presents an especially dangerous situation. Not only does it prevent those without the financial resources from accessing coastal resources, it negatively impacts such resources in at least two ways. First, RVs and related infrastructure located in close proximity to sensitive wetlands will result in negative water quality impacts. In addition, as sea levels rise, such infrastructure will be subject to inundation, further negatively impacting coastal resources and water quality.

In addition, as reflected in the Coastal Commission's enforcement action and State Lands Commission's subsequent rebuke to the City, commercial enterprises entrusted with public trust resources must be closely monitored. Campland's intention to retain an outsized foothold in the Project area is no secret and neither is its resort to a less than forthright outreach campaign. Campland and Mission Bay Park RV Resort have solicited public comments on the PEIR, providing a template which touts the free year-round campsites to underserved youth and families as justification for keeping Campland and Mission Bay Park RV Resort.⁴⁹ Notably absent from the template is any reference to the Coastal Commission's enforcement action which required the in-kind program in lieu of \$750,000 in penalties for years of Campland and Mission Bay Park RV Resort's unlawful public access restrictions.⁵⁰

In contrast, truly low-cost (non-profit) and passive visitor accommodations would provide enhanced access without the added City oversight. Such options could be readily integrated into the ReWild alternatives.

D. The Project is Inconsistent with the Climate Action Plan

The Climate Action Plan's fifth strategy, Resilient Infrastructure and Healthy Ecosystems, sets a goal of restoring 350 acres of salt marsh land and other associated tidal wetland and riparian habitats by 2030 and 700 acres by 2035. The first deadline is a mere seven years away. To achieve this level of restoration by 2030 and 2035 significant planning efforts are required *today*. This Project offers the best and most realistic option to achieve these targets. As noted on the Project website:

One of the primary goals of the De Anza Natural plan amendment is to identify wetland restoration areas, which will contribute significantly to meeting CAP wetland restoration targets, increase Mission Bay's resilience to the impacts of climate change, provide critical habitat for

⁴⁸ Id.

⁴⁹ <https://mobilize4change.org/kprk/CA/>; see also,

<https://www.sofsanclia.co.com/opinion/2023/03/12/camping-on-mission-bay-is-a-public-treasure-that-must-be-preserved/>.

⁵⁰ Consent Case and Decist Order No. CCC-21-CD-01 Staff Report, p. 19.



O15-16
cont.

O15-17

phase of the project to ensure that any impacts to sensitive habitats are avoided, minimized, or mitigated as conditions of project approval prior to implementation. The comment further states that without a sea level rise analysis, the PEIR fails to disclose potential impacts. Please refer to response to comment O15-11 regarding the sea level rise analysis prepared for the project.

O15-16: This comment summarizes a past situation between Campland and Mission Bay RV Resort and the California Coastal Commission. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR for the project, and no further response is warranted.

O15-17: This comment states that the project is inconsistent with the Climate Action Plan (CAP) and it should maximize wetland creation to ensure the City is on track to achieve its strategy 5 goals and implement an appropriate adaptation policy for projected sea level rise, consistent with the third project objective. As identified in PEIR Section 5.4, Greenhouse Gas Emissions, the project would be consistent with the CAP. The project would contribute to the overall restoration goals of the CAP. In addition, other restoration areas within the City's jurisdiction are also being considered to meet the goals of the CAP. The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 225.1 acres of wetlands in the Mission Bay Park.

sensitive species, and create passive recreation and educational opportunities.¹¹

O15-17
cont.

Therefore, De Anza Natural should maximize wetland creation to ensure the City is on track to achieve its strategy 5 goals and implement an appropriate adaptation policy for projected sea level rise, consistent with the third project objective. Because the City's CAP Implementation Plan does not include any specific projects in-process that would help the City meet these substantial habitat creation targets, the instant Project is even more critical. Unless the Project is revised to incorporate wetland acreage commensurate with the Wildest alternative, the Project will remain inconsistent with the CAP.

E. Conclusion

O15-18

For decades the MBPMP has promised the restoration of the De Anza SSA and the area currently occupied by Campland. The Project and PEIR represent a significant step toward achievement of the MBPMP's goals. However, revisions to the project objectives, alternatives analysis, and historical resources analysis are required. Wildest-level acreage of restored habitats and the prioritization of wetland restoration are necessary to ensure compliance with the MBPMP, SEP, City Charter, and CEQA.

O15-19

In addition, to ensure the Project delivers the water quality benefits envisioned by applicable planning documents, regulators, and the public, the PEIR must incorporate a project objective consistent therewith. Likewise, the PEIR's definition of recreational activities and low-cost accommodations must be revised to acknowledge the "progressive values" touted by the City in its SEP application. Restored, functional habitats provide active and passive recreational opportunities accessible to a wide range of users. In summary, to serve its informational purpose, the PEIR must be revised to reflect the unique opportunity presented.

Thank you in advance for your consideration of our comments.

Sincerely,

COAST LAW GROUP, LLP



Livia Borak Beaudin
Attorneys for San Diego Audubon and CERF

Enclosure: 1. Coastal Commission Staff Report, Consent Case and Desist. Order No. CCC-21-CD-01

¹¹ <https://www.sandiego.gov/planning/work/park-planning/de-anza>



The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

O15-18: This comment states that the PEIR represent a significant step toward achievement of the MBPMP's goals. However, the comment states that revisions to the project objectives, alternatives analysis, historical resources analysis are required and the inclusion of Wildest-level acreage of restored habitats are necessary to ensure compliance with the MBPMP, SEP, City Charter, and CEQA. Please refer to response to comment O15-3. No revisions to the PEIR are warranted.

O15-19: This comment states that the PEIR must incorporate a project objective addressing water quality and should revise the definition of recreational activities and low-cost accommodations. Please refer to responses to comments O15-3 and O15-4. As discussed in PEIR Chapter 3.0, the project would enhance the existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations (recreational vehicles and other low-cost camping facilities), active and passive recreational opportunities to enhance public use of the area, and

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Staff: Rob Modellmog-SF
Staff Report: 8/26/21
Hearing Date: 9/9/21**STAFF REPORT: Recommendations and Findings for
Consent Cease and Desist Order No. CCC-21-CD-01 and
Consent Administrative Penalty No. CCC-21-AP-01****Consent Cease and Desist Order No.:** CCC-21-CD-01**Consent Administrative Penalty No.:** CCC-21-AP-01**Related Violation File:** V-6-19-0171**Violator:** Campland, LLC and Northeast MB, LLC**Project Location:** State tidelands granted to the city of San Diego and commonly known as: 1) Campland on the Bay, located at 2211 Pacific Beach Drive (approximately 40 acres of land and 5.5 acres of water space in Mission Bay Park, as described in the April 25, 2017 lease between the City of San Diego and Campland, LLC); and 2) Mission Bay RV Resort, located at 2727 De Anza Road (approximately 70 acres of land and 6 acres of water space in Mission Bay Park, as described in the July 1, 2019 lease between the City of San Diego and Northeast MB, LLC), in the City of San Diego.**Violation Description:** 1) placement of signs and other physical items of development, including, but not limited to, signs restricting access to the public and signs stating that the Leased Tidelands are private property, 2) placement of physical objects that blocked public access, including storage of dumpsters, trailers, and boats in public parking areas, and 3) undertaking other actions that have the effect of impeding or discouraging public access, including: use of private security guards and fences that block and/or impede public access to beaches, public parking areas, and public tidelands;

improvements to access to recreational uses. Active recreation areas are meant to support land-based active recreational pursuits including but not limited to sand volleyball, pickleball, tennis, walking, cycling, and inline/roller skating. Regional parkland would support activities such as picnicking, kiteflying, Frisbee games, informal sports, walking, jogging, children's play, bicycling, and skating. Watercraft access would be provided on De Anza Cove at the proposed Boat Facilities/Clubhouse land use. Non-motorized personal watercraft including kayaks and canoes would have access on De Anza Cove at the Boat Facilities/Clubhouse. The project would replace much of the low-cost visitor guest accommodations offered by Campland and the Mission Bay RV Resort by offering 48.5 acres of new low-cost visitor guest accommodations, which would include a land use for RVs, cabins, or other eco-friendly accommodations. At the current programmatic level, there is no proposed design for the project. No revisions to the PEIR are warranted.

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advertising on Respondent's company website and Respondents' advertising on other websites that the beach at Campland is a "private beach;" and labeling the required public parking area as "guest parking" on the Mission Bay RV Resort website; all of which had the effect of changing the intensity of use of beaches, public parking areas, and public tidelands, and of access thereto.

Substantive File Documents: Public documents in Consent Cease and Desist Order and Consent Administrative Penalty File Nos. CCC-21-CD-01 and CCC-21-AP-01; Exhibits 1 through 13; and Appendix A of this staff report.

CEQA Status: Categorically Exempt (Cal. Code of Regs., tit. 14, §§ 15321(a)).

SUMMARY OF STAFF RECOMMENDATION AND FINDINGS

Overview

This matter involves two private resorts, Campland on the Bay ("Campland") and Mission Bay RV Resort, that both lease public property from the City of San Diego, but did not provide required public access to beaches and parking areas located on these leased public lands in Mission Bay, in San Diego. These two resorts are owned and operated by related entities with the same president, and are referred to collectively herein as Respondent. As described below, this right of public access arose decades ago at Campland via a lease from the City of San Diego ("the City") to Campland's predecessor, and arose in 2019 at Mission Bay RV Resort in a lease to Respondent.

Mission Bay is located to the north of San Diego Bay, and Campland on the Bay and Mission Bay RV Resort are both located on tidelands held in trust for the public in the northeast corner of the bay. This area of Mission Bay is popular with swimmers, boaters, and paddlers looking for calm water to enjoy. Respondents' resorts are adjacent to each other, and to the west of Campland are the wetlands of the Kendall-Frost Mission Bay Marsh Reserve. To the east of Mission Bay RV Resort is De Anza Cove Park, a park with grass and recreation facilities. Much of the rest of the Mission Bay bayfront is occupied by similar public parks and recreational businesses.

The beaches at Campland and Mission Bay RV Resort are both only accessible by land by entering and passing through the resorts themselves. While there is some public parking available outside Mission Bay RV Resort and Campland, it is limited and not close to the beaches accessed through the resorts.

The Leases

In 1945, the State of California granted tidelands, held in the public trust in Mission Bay, to the City, including these tidelands ("the Leased Tidelands") which make up the totality of the Properties, but "reserved to the people of the State of California the absolute right to fish in the waters of Mission Bay with the right of convenient access to such waters," among other conditions. Since then, the City has held these lands in trust for the public and has leased much of Mission Bay to private commercial businesses for recreational purposes.

Campland Leases

In 1967, the City entered into a 50-year lease agreement with Tri-Square Construction Co. Inc for private use of a bayfront area of Mission Bay now referred to as Campland. This lease required, among other things, the lessee to provide public access to the beach on Mission Bay. In 1975, a predecessor of Respondent took over this lease.

In 2017, Respondent entered into a new 3-year lease with the City. This lease affirmed the existing requirements to provide for public access to the beach and added a new requirement to provide 31 free public parking spots at Campland. In addition, the lease included requirements to post signs stating that the area is open to the public. In 2019, this lease was extended to 2023, and the City reserved the right to grant other short-term lease extensions.

Mission Bay RV Resort Leases

In 2019, Respondent entered into a lease with the City at the area referred to as Mission Bay RV Resort. This leased public property, located to the east of Campland in northeast Mission Bay, was historically operated as a private mobile home park by a different manager. In 2019, the City entered into a four-year lease agreement (with the possibility of a one-year extension) with Northeast MB for this area, now referred to as Mission Bay RV Resort. This lease also included requirements to provide public access to the beach, as well as public access to bike and pedestrian paths and a requirement to provide free access to a large public parking lot there. In addition, this lease also included requirements to post signs stating that this area was public.

Violation History at the Resorts

Campland

In 2015, Respondent advertised the beach at Campland as a "private beach" on its own website, as well as on other websites, even though the beach was legally supposed to be open to the public, as the lease required the area to be "available for use by the general public." Respondent also posted signs that had the effect of blocking public access to the beach, including some declaring Campland to be "Private Property," even though the area is actually leased land in a public park.

After Campland's 2017 lease reiterated the requirement for public access to the beach and added a new requirement for 31 free public parking spaces, Respondent, among undertaking other unpermitted development and activities, failed to provide the 31 free public parking spots, on numerous instances told the public they could not enter Campland, failed to install City-required signs indicating that the area was public, and instead maintained signs stating that the area was private property.

Mission Bay RV Resort

Similarly, Mission Bay RV Resort's 2019 lease identified a public parking area that was to be provided for use by the public for free. This lease required Respondent to provide public access to the designated public parking area, as cars could only reach this parking lot by passing through the leased land of the resort. Like at Campland, this lease also requires Respondent to post signs identifying the area as owned by the City and available for public use. However, Respondent failed to post the signs identifying the area as public, and instead maintained a sign at the entrance that stated "Mission Bay RV Resort Parking Only," and signs within the designated public parking lot stating "Guest Parking Only" and "Parking by Permit Only," and labeled the public parking lot as "Guest Overflow" on their website. These signs and labels had the effect of blocking public access to the public parking there. These signs impeded public access for those wishing to park to access the beach and the trail, or to fish.

Respondent's actions noted herein violated the lease requirements at both Campland and Mission Bay RV Resort and constituted 'development' under the Coastal Act, but no Coastal Development Permit ("CDP") was obtained. Therefore, these actions constituted unpermitted development and violations of the Coastal Act.

Commission Enforcement Discovery

After receiving reports of the violations, Commission staff sent Respondent a Notice of Violation in June of 2020. Upon receiving the notice, Respondent quickly removed most of the "private property" signs and other obstructions to public access at both resorts. However, the Commission continued to receive reports that Respondent was not allowing the public into Campland, and that the guards were also telling the public that no public parking was available at Campland.

Although the City lease affirmatively requires that Respondent provide public access to beaches and public parking areas at Campland and Mission Bay RV Resort, these leased areas of public land were privatized by Respondent. Respondent's paying guests have used the parking lots and have enjoyed easy and convenient access to the beaches at the resorts that was not provided to the general public.

A Matter of Environmental Justice

The public access violations here present a threat of environmental injustice given the prices to stay at Campland and Mission Bay RV Resort. Both resorts are more expensive than nearby public campgrounds, although the nearby public campgrounds

do not provide the same recreational amenities, such as a pool and live entertainment, that the Campland resort provides. The approximate base cost of renting a campground space for a tent for two weekend, non-holiday nights at Campland in the summer is \$292. This is over three times the cost of the nearby state campground at San Elijo State Beach in Cardiff, which would cost approximately \$80 for two weekend nights in the summer and which does not charge more for holidays. At Mission Bay RV Resort, the base cost for an RV space is approximately \$282, which is approximately double the cost of the nearby public RV campground at Silver Strand State Beach in Coronado, which would cost approximately \$140 for two nights and also does not charge more for holidays. Therefore, when Respondent restricted access here, use of the beaches and parking on these tidelands were restricted to people who could afford the relatively high costs of camping at the resorts here, and/or could afford the relatively high cost of owning an RV.

It is an important precept of environmental justice in California that all of the public should enjoy access for recreation at coastal areas. Public access and coastal recreation continue to be threatened by unpermitted restrictions on beach or coastal access. While commercial businesses and people who can afford to patronize those businesses benefit from private development fronting Mission Bay and our coast generally, those that do not have these means and/or live far from the coast receive the burdens associated therewith.

The Proposed Resolution

However, Respondent has worked relatively quickly with Commission enforcement staff to reach this proposed consensual resolution, and has agreed to resolve the violations and to also provide both measures to address civil penalties and lost public access. The proposed agreement has three general provisions. The first requires Respondent to comply with the requirements of the lease and to restore public access here, and to prevent any further restriction of public access by installing new signs that explain what areas are public, instituting an employee training program to assist the public in accessing these areas, and adding text to their website explaining that the area is public, and requesting that any third party websites with references to private beaches at these resorts correct their websites to explain that these areas are public.

Secondly, the proposed Consent Agreement provides for a payment of \$250,000 to the Violation Remediation Fund and also provides new benefits to the public "in lieu" of a higher penalty. Respondent's proposed "in lieu" program is a free camping program for underserved youth and families that will bring people who otherwise would not have easy access to our coast to stay at these resorts. Under the proposed Consent Agreement, Respondent will provide this program for a value of \$50,000 for 5 years, or until Respondent's current leases, or any extension of those leases, ends, starting from the date the free camping program is implemented and available to the public. Respondent will advertise the program in underserved communities to find participants and transport them for free to Campland if they require transportation. The participants will also be able to request free camping gear if they need it, and will be able to use the recreational amenities, such as the pool, for free as would any other guest. In addition,

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Respondent will provide free watercraft rentals as part of this program. At least 25% of the free nights at the resort will be during summer, and at least 25% will be during weekends, and Respondent will provide regular monitoring reports to update the Commission as to what program benefits the money was spent on.

Thirdly, in addition and as mitigation for the previous lost public access, under the proposed Consent Agreement Respondent will undertake a number of additional actions to improve public access at the facilities including the following: 1) remove a fence not built by Respondent but that currently blocks access via the beach to the beach adjacent to Mission Bay RV Resort, 2) provide new public restrooms at Mission Bay RV Resort and provide public access to the existing restroom nearest the beach at Campland, 3) provide 16 electric vehicle charging spaces among the two resorts, 4) record and advertise a video explaining to the public how to access the public beaches and amenities at the resorts, 5) install six interpretive signs between the resorts to educate the public about Mission Bay, and 6) implement a marine debris reduction program to reduce plastic pollution at the resorts. The total combined value of the public amenities plus the free camping program is estimated to be in excess of a value of \$1 million to the public.

Staff therefore recommends that the Commission **APPROVE** Consent Cease and Desist Order No. CCC-21-CD-01 and Consent Administrative Penalty CCC-21-AP-01.

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**APPENDIX A – Proposed Consent Cease and Desist Order No. CCC-21-
CD-01 and Consent Administrative Penalty No. CC-21-AP-01**

EXHIBITS

Exhibit 1 Region Map
Exhibit 2 Leased Tidelands Map
Exhibit 3 Public Beach Overview at Campland
Exhibit 4 Public Parking Overview at Mission Bay RV Resort
Exhibit 5 Public Beach Overview at Mission Bay RV Resort
Exhibit 6 Unpermitted Sign at Campland Entrance
Exhibit 7 Campland Website Advertising 'Private Beach'
Exhibit 8 Unpermitted Sign at Mission Bay RV Resort Entrance
Exhibit 9 Unpermitted Signs at Mission Bay RV Resort Parking Area
Exhibit 10 2017 Campland Lease
Exhibit 11 2019 Mission Bay RV Resort Lease
Exhibit 12 June 26, 2020 Notice of Violation
Exhibit 13 February 18, 2021 Notice of Intent to Issue a Cease and Desist Order and
Administrative Penalty

I. MOTIONS AND RESOLUTION

Motion 1: Consent Cease and Desist Order

I move that the Commission **issue** Consent Cease and Desist Order No. CCC-21-CD-01 to Campland, LLC and Northeast MB, LLC, pursuant to the staff recommendation.

Staff Recommendation of Approval:

Staff recommends a **YES** vote. Passage of this motion will result in adoption of the resolution immediately below and issuance of the Consent Cease and Desist Order. The motion passes only by an affirmative vote of a majority of Commissioners present.

Resolution to Approve the Consent Cease and Desist Order:

The Commission hereby issues Consent Cease and Desist Order No. CCC-21-CD-01, as set forth in Appendix A, and adopts the findings set forth below on the ground that development has occurred without the requisite Coastal Development Permit, in violation of the Coastal Act, and that the requirements of the Consent Cease and Desist Order are necessary to ensure compliance with the Coastal Act.

Motion 2: Consent Administrative Civil Penalty Action:

I move that the Commission **issue** Consent Administrative Penalty No. CCC-21-AP-01 to Campland, LLC and Northeast MB, LLC, pursuant to the staff recommendation.

Staff Recommendation of Approval:

Staff recommends a **YES** vote on the foregoing motion. Passage of this motion will result in adoption of the resolution immediately below and the issuance of the Consent Administrative Penalty. The motion passes only by an affirmative vote of a majority of Commissioners present.

Resolution to Issue Consent Administrative Civil Penalty Action:

The Commission hereby assesses an administrative civil penalty by adopting Consent Administrative Penalty No. CCC-21-AP-01, as set forth in Appendix A, and adopts the findings set forth below on the grounds that activities and failures to act have occurred on properties leased by Campland, LLC and Northeast MB, LLC, Inc without a coastal development permit, in violation of the Coastal Act, and that these activities or failures to act have limited or precluded public access and violated the public access policies of the Coastal Act.

II. HEARING PROCEDURES

The procedures for a hearing on a Cease and Desist Order pursuant to Section 30810 are outlined in the Commission's regulations at California Code of Regulations, Title 14 ("14 CCR") Section 13185. The requisite procedure for imposition of administrative penalties pursuant to Section 30821 of the Coastal Act (Pub. Resources Code, Div. 20) is set forth in Section 30821(b), which specifies that penalties shall be imposed by majority vote of all Commissioners present in the context of a public hearing in compliance with the requirements of Section 30810, 30811, or 30812. Therefore, the procedures employed for a hearing to impose administrative penalties may be the same as those used for a Cease and Desist Order hearing.

For a Cease and Desist Order hearing and an Administrative Penalty action, the Chair shall announce the matter and request that all parties or their representatives present at the hearing identify themselves for the record, indicate what matters are already part of the record, and announce the rules of the proceeding, including time limits for presentations. The Chair shall also announce the right of any speaker to propose to the Commission, before the close of the hearing, any question(s) for any Commissioner, at his or her discretion, to ask of any other party. Staff shall then present the report and recommendation to the Commission, after which the alleged violator(s) or their representative(s) may present their position(s) with particular attention to those areas where actual controversy exists. The Chair may then recognize other interested persons, after which the Commission typically invites staff to respond to the testimony and to any new evidence introduced.¹

The Commission will receive, consider, and evaluate evidence in accordance with the same standards it uses in its other quasi-judicial proceedings, as specified in 14 CCR Section 13185, incorporating by reference Section 13065. The Chair will close the public hearing after the presentations are completed. The Commission may ask questions to any speaker at any time during the hearing or deliberations, including, if any Commissioner so chooses, any questions proposed by any speaker in the manner noted above.

Finally, the Commission shall determine, by a majority vote of those present and voting, whether to impose administrative penalties. The Commission shall also determine, by a majority vote of those present and voting, whether to issue the Cease and Desist Order and impose an Administrative Penalty, either in the form recommended by staff, or as amended by the Commission. Passage of the motions above, per the staff recommendation, or as amended by the Commission, will result in the issuance of the Consent Cease and Desist Order and imposition of a Consent Administrative Penalty.

¹ Note that there are currently in use virtual hearing procedures, available at <https://documents.coastal.ca.gov/assets/virtual-hearing/VIRTUAL-HEARING-PROCEDURES.pdf>.

**III. FINDINGS FOR CONSENT CEASE AND DESIST ORDER
CCC-21-CD-01 AND CONSENT ADMINISTRATIVE PENALTY
NO. CCC-21-AP-01²**

A. Description of Leased Tidelands

The Leased Tidelands that are the subject of this Consent Agreement are located in the northeastern portion of Mission Bay in the city of San Diego (**Exhibit 1**). The Leased Tidelands include two bayfront areas that are separated from the other by Rose Creek (**Exhibit 2**). Respondent operates the western area of the Leased Tidelands as Campland-on-the-Bay ("Campland"), and the eastern area as Mission Bay RV Resort. To the west of Campland is the Kendall-Frost Mission Bay Marsh Preserve, and to the east of Mission Bay RV Resort is the public De Anza Cove Park. South of the Leased Tidelands are Mission Bay Park and Fiesta Island.

While the historic wetlands of what is now Mission Bay were largely removed in the 1940's as part of a project to create this large recreational bay, important wetlands still exist adjacent to Campland at the Kendall-Frost Mission Bay Marsh Preserve. In addition, Mission Bay is on the Pacific Flyway for migratory birds, and Fiesta Island to the south of the Leased Tidelands is habitat for endangered California least terns.

The area of Mission Bay near the Leased Tidelands is characterized by recreational facilities, public parks, and habitat area, and many people come to enjoy the calm water for swimming and using small watercraft such as kayaks and jet skis, as well as to launch boats. People also come to picnic and barbeque, and to walk and bike along the waterfront and beaches. While the nearby parks consist of unfenced open space, the beaches at the resorts at Campland and Mission Bay RV Resort are surrounded by the resorts themselves, which are fenced.

Campland

The landward boundary of Campland is surrounded by a fence. Therefore, in order to access the beach at Campland via land, one must pass through a single entry point that includes a guard and gate. Once past the guard and gate, one must continue on through the resort itself to reach the beach.

Mission Bay RV Resort

The beach at Mission Bay RV Resort similarly cannot be accessed via land without passing through the resort itself. The beach would be accessible via foot by walking from the adjacent beach at De Anza Cove Park, however, a fence built by a prior lessee

² These findings also hereby incorporate by reference the Summary at the beginning of the 8/28/21 staff report ("Staff Report: Recommendations and Findings for Consent Cease and Desist Order No. CCC-21-CD-01 and Consent Administrative Penalty No. CCC-21-AP-01") in which these findings appear, which section is entitled, "Summary of Staff Recommendations and Findings."

that predates Respondent's lease currently extends into the water and separates the two beaches. This fence is associated with an abandoned mobile home park that existed before Respondent's lease. Thus, visitors to the beach via land at Mission Bay RV Resort currently cannot pass this fence and therefore must pass through the Mission Bay RV Resort entrance gate and through the resort itself. Similarly to the beach at Campland, the beach at Mission Bay RV resort cannot be accessed via land without passing through a narrow access point and then through the RV resort itself, and past a similar guard.

Lease History

In 1945, the State of California granted tidelands, held in the public trust to the city of San Diego in what is now Mission Bay. The grant of these public trust tidelands "reserved to the people of the State of California the absolute right to fish in the waters of Mission Bay with the right of convenient access to such waters," among other conditions. Since then, the City has leased much of the Mission Bay waterfront to private commercial businesses for recreational purposes.

The Campland Leases

In 1967, the City entered into a 50-year lease agreement with Tri-Square Construction Co. Inc., filed with the City Clerk on April 30, 1968 as Document No. 723339, for an area of filled land in Mission Bay now referred to as Campland. This lease required the lessee to provide public access to the beach on Mission Bay, among other things. In 1968, the original lease was assigned to Mission Bay Campland Inc. According to Michael Gelfand, the current President of the Respondent entities, his father purchased the lease for Campland in 1975, and the Gelfand family has managed Campland since that date.

In 2017, Campland, LLC (Respondent) started a new three-year lease with the City at Campland, with the possibility of two one-year extensions, filed with the City Clerk on April 4, 2017 as Document No. RR-311006. This lease also included requirements to provide public access to the beach, including a requirement to provide 31 free public parking spots at Campland. In addition, the lease also included requirements to post signs stating that the area is open to the public. In 2019, this lease was extended to June 30, 2023, and the City reserved the right to give up to 4 one-year lease extensions, among other short-term lease extension possibilities.

The Mission Bay RV Resort Leases

The leased public property to the east of Campland in northeast Mission Bay was historically operated as a mobile home park. Then, in 2019, the City entered into a four-year lease agreement with the possibility of a one-year extension with Northeast MB, LLC (Respondent) for this area of filled tideland, now referred to as Mission Bay RV Resort. This lease also includes requirements to provide public access to the beach, as well as public access to bike and pedestrian paths and a requirement to provide free access to a large public parking lot. In addition, this lease also included requirements to

post signs stating that this area was public. This lease was filed with the City Clerk on June 24, 2019 as Document No. R-312531 and this leased area has since been managed by Respondent entity, Northeast MB, LLC.

B. Violation History

Campland

The 1967 lease for Campland required Respondent to observe all laws, including laws passed after the lease went into effect, which includes the Coastal Zone Initiative that went into effect in 1972, and the Coastal Act, which went into effect in 1976. However, during the period of time Respondent managed the property under this lease, Respondent posted signs that had the effect of blocking public access to the beach at Campland, including some declaring Campland to be "private property," even though the area is actually leased land in a public park that is required to be open to the public for access. In addition, in 2015, Respondent advertised the beach at Campland as a "private beach" on its own website, even though the lease required the area to be "available for use by the general public."

Then in 2017, the 1967 lease expired after its term of 50 years, and Campland, LLC entered into a new lease with the City to continue to lease this part of Mission Bay. The 2017 Campland Lease identifies the area as a public park and requires the provision of thirty-one (31) free public parking spaces to be reserved for use by the general public. The lease explains that the "general public" consists of "persons not patronizing or otherwise using the Premises for an Allowed Use." The lease also requires that all signs be approved by the City and requires compliance with all applicable laws. In addition, the public trust tidelands grant from the state to the City still requires public access for the purposes of fishing.

Respondent, among undertaking other unpermitted development, did not provide the 31 free public parking spots. In addition, on multiple instances, Respondent also refused entry altogether to people who desired to drive in and use the free general public parking area to access the beach. Further, Respondent failed to put up the required signs identifying the property as City-owned and available for public use, and instead maintained signs declaring the area to be private property, resulting in the impediment of public access. In addition, Respondent maintained a webpage that declared Campland to have a "private beach," further deterring the public from using this area as intended.

Mission Bay RV Resort

The 2019 Mission Bay RV Resort Lease requires Respondent, as the lessee of land surrounding the parking lot, to provide public access to the designated public parking lot, as well as the beach and bike and pedestrian boardwalk. Similarly to the Campland lease, this lease also required Respondent to post signs identifying Mission Bay RV Resort as owned by the City and available for public use. In addition, the lease requires that all signs be approved by the City and requires compliance with all applicable laws.

Also, the public trust tidelands grant from the state to the City still requires public access for the purposes of fishing.

However, Respondent did not post any signs identifying the area as City-owned and open to the public, and instead maintained a sign at the entrance stating "Mission Bay RV Resort Parking Only," and signs within the parking lot itself stating "Guest Parking Only" and "Parking by Permit Only." These signs had the effect of blocking public access to the public parking there, and also deterred public access for those wishing to park to access the beach and the trail, or to fish. Respondent also maintained several other physical items of development directly blocking public parking spaces at Mission Bay RV Resort, including dumpsters. In addition, Respondent maintained webpages illustrating and stating that the public parking area was instead designated for guests of the resort.

Respondent's actions that violated the lease requirements at both Campland and Mission Bay RV Resort constituted 'development' under the Coastal Act, but no Coastal Development Permit ("CDP") was obtained. Therefore, these actions constituted unpermitted development and violations of the Coastal Act.

Enforcement History

After receiving reports of the violations, Commission staff sent Respondent a Notice of Violation in June of 2020. Upon receiving the notice, Respondent quickly removed most of the signs and other obstructions to public access. However, the Commission continued to receive reports that Respondent's guards were not allowing the public into Campland, and that the guards were also telling the public that no public parking existed there.

However, Respondent worked quickly with Commission enforcement staff to reach this consensual resolution. In order to fully restore public access to Campland and Mission Bay RV Resort, the agreement reached requires Respondent to prevent any further restriction of public access by installing new signs that explain what areas are public, instituting an employee training program to assist the public in accessing these areas, and adding text to their website explaining that the area is public, and requesting that any third party websites with references to private beaches at these resorts correct their websites to explain that these areas are public.

C. Basis for Issuing Consent Cease and Desist order

1. Statutory Provision

The statutory authority for issuance of this Cease and Desist Order is provided in Coastal Act Section 30810, which states, in relevant part:

- (a) [I]f the commission, after public hearing, determines that any person or governmental agency has undertaken, or is threatening to undertake, any activity that (1) requires a permit from the commission without securing the

permit . . . the commission may issue an order directing that person or governmental agency to cease and desist . . .

- (b) The cease and desist order may be subject to such terms and conditions as the commission may determine are necessary to ensure compliance with this division, including immediate removal of any development or material or the setting of a schedule within which steps shall be taken to obtain a permit pursuant to this division.

2. Factual Support for Statutory Elements

The statutory provision requires the Commission to demonstrate that Respondent undertook an activity that requires a CDP where Respondent did not secure one.

In this case, it is uncontroverted that Respondent does not have a CDP for the development at issue here. The subsequent step is demonstrating Respondent took an action requiring a CDP. Section 30600(a) of the Coastal Act states that, in addition to obtaining any other permit required by law, any person wishing to perform or undertake any development in the Coastal Zone must obtain a CDP. "Development" is broadly defined by Coastal Act Section 30106, in relevant part:

"Development" means, on land, in or under water, ... the placement or erection of any solid material or structure... change in the density or intensity of use of land, ... change in the intensity of use of water, or of access thereto; construction, reconstruction, demolition, or alteration of the size of any structure...

Under the Coastal Act's definition of development, Respondent performed the following acts of "development": 1) placement of signs and other physical items of development, including, but not limited to, signs restricting access to the public and signs stating that the Leased Tidelands are private property, 2) placement of physical objects that blocked public access, including storage of dumpsters, trailers, and boats in public parking areas, and 3) undertaking other actions that have the effect of impeding or discouraging public access, including: use of private security guards and fences that block and/or impede public access to beaches, public parking areas, and public tidelands; advertising on Respondent's company website and Respondents' advertising on other websites that the beach at Campland is a "private beach," and labeling the required public parking area as "guest parking" on the Mission Bay RV Resort website; all of which had the effect of changing the intensity of use of beaches, public parking areas, and public tidelands, and of access thereto.

All of the above activities fall clearly within the Coastal Act definition of development and, therefore, required respondent to secure a CDP to authorize the development. Change in intensity of use of water, or of access thereto, is expressly listed as development and is the prime component of Respondent's actions. Respondent's actions to restrict access to the Mission Bay beaches via signs, guards, advertising, and physical obstructions all changed the intensity of access there.

None of this development, however, received any such Coastal Act authorization. Therefore, all of these items and activities constituted unpermitted development, and pursuant to Section 30810, this development constituted an activity that required a permit from the commission without securing the permit. Thus, this triggered the independent criterion in section 30810(a), therefore authorizing the Commission's issuance of this Cease and Desist Order.

b. The Unpermitted Development at Issue is not Consistent with the Coastal Act's Access Provisions and Principles of Environmental Justice

The following discussion does not address any required element of Section 30810 of the Coastal Act, and the findings in this section are therefore not essential to the Commission's ability to issue a cease and desist order. This explication is, however, important for context, and for understanding the totality of impacts associated with the violations and for analyzing factors discussed in Section D, below, and for noting that this proposed resolution would benefit all public users by restoring and improving public access to this area.

Public Resources Code Section 30210 states:

In carrying out the requirements of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Additionally, Section 30013 provides:

The Legislature further finds and declares that in order to advance the principles of environmental justice and equality, subdivision (a) of Section 11135 of the Government Code and subdivision (e) of Section 65040.12 of the Government Code apply to the commission and all public agencies implementing the provisions of this division.

Section 30107.3 defines Environmental Justice as:

... the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.

The Leased Tidelands are held in the public trust for all Californians, and the City therefore required public access to these Leased Tidelands, including the beaches and parking areas. When Respondent restricted access to the Leased Tidelands, only paying guests of the resorts were able to easily access the beaches and parking areas. This meant that the coast in this area was only easily accessible to those able to afford to stay in these resorts. However, the resorts at Campland and Mission Bay RV Resort are much more expensive than nearby public campgrounds. This is in part due to the fact that the resort at Campland has additional recreational amenities such as a pool and live entertainment that nearby public campgrounds do not have, however, the

overall daily rates are the main issue with regards to availability of low-cost coastal accommodations.

The approximate base cost of renting a campground space for a tent for two weekend nights at Campland in the summer is \$292. This is over three times the cost of the nearby state campground at San Elijo State Beach in Cardiff, which would cost approximately \$80 for two weekend nights in the summer. At Mission Bay RV Resort, the base cost for an RV space is approximately \$282, which is approximately double the cost of the nearby public RV campground at Silver Strand State Beach in Coronado, which would cost approximately \$140 for two nights. Therefore, when Respondent restricted access here, the beaches and parking on these tidelands were restricted to people who could afford the relatively high costs of camping at these resorts.

It is an important precept of environmental justice in California that all of the public should enjoy access for recreation at coastal areas. Public access and coastal recreation continue to be threatened by unpermitted restrictions on beach or coastal access. While commercial businesses and people who can afford to patronize those businesses benefit from private development fronting the beach and ocean, those that do not have these means and/or live far from the coast receive the burdens associated therewith. Securing open public access for all citizens provides low-cost, outdoor recreation that can improve the overall quality of life for all of the public. The unpermitted development at issue in this matter is therefore inconsistent with the public access policies of the Coastal Act.

Free Camping Program

As part of the mitigation for these violations and in order to promote environmental justice, Respondent will create a free camping program to help underserved youth and families enjoy this area just as paying guests do. The free camping program participants are defined as individuals or communities that have been historically excluded from accessing the benefits of coastal opportunities and/or disproportionately impacted by environmental burdens and includes, but is not limited to, low-income households; Black, Indigenous, and people of color; people with disabilities; youth who attend Title 1 schools (and their caregiver/s); and foster and transition age youth. In order to make the program as inclusive as possible, Respondent has agreed to advertise to find potential participants in San Diego County that might not have otherwise heard of this opportunity.

In addition, Respondent will fund transportation and camping equipment for program participants to use for free if they request it. When at the resort, program participants will be able to use the resort amenities such as the pool and live entertainment, just as paying guests are able to. Respondent can also propose to provide free watercraft rentals as well, which would include things like paddle boards and kayaks. While San Diego is generally sunny year-round, the proposed agreement provides that at least 25% of the camping nights must be during the summer so that program participants can enjoy this area when it is warm and school is out of session. In addition, at least 25% of camping nights must be on weekends so that it is easier for working families to

participate as well. The Commission has not overseen many detailed programs like this before, and so in order to ensure that the program operates as well as possible, Respondent shall submit regular reports explaining what benefits were provided, and how the program might be improved.

D. Basis for Issuing Consent Administrative Civil Penalty Action

1. Statutory Provision

The statutory authority for imposition of administrative penalties is provided in the Coastal Act in Public Resources Code Section 30821,³ which states, in relevant part:

(a) In addition to any other penalties imposed pursuant to this division, a person, including a landowner, who is in violation of the public access provisions of this division is subject to an administrative civil penalty that may be imposed by the commission in an amount not to exceed 75 percent of the amount of the maximum penalty authorized pursuant to subdivision (b) of Section 30820 for each violation. The administrative civil penalty may be assessed for each day the violation persists, but for no more than five years.

In addition, sections 30820 and 30822 create potential civil liability for violations of the Coastal Act more generally. Section 30820(b) also provides for daily penalties, as follows:

Any person who performs or undertakes development that is in violation of [the Coastal Act] or that is inconsistent with any coastal development permit previously issued by the commission . . . , when the person intentionally and knowingly performs or undertakes the development in violation of this division or inconsistent with any previously issued coastal development permit, may, in addition to any other penalties, be civilly liable . . . in an amount which shall not be less than one thousand dollars (\$1,000), nor more than fifteen thousand dollars (\$15,000), per day for each day in which the violation persists.

Section 30822 states:

Where a person has intentionally and knowingly violated any provision of this division or any order issued pursuant to this division, the commission may maintain an action, in addition to Section 30803 or 30805, for exemplary damages and may recover an award, the size of which is left to the discretion of

³ All section references in this section, III.C, are to the California Public Resources Code, and as such, to the Coastal Act, unless otherwise indicated.

the court. In exercising its discretion, the court shall consider the amount of liability necessary to deter further violations.

Through the proposed settlement, Respondent has agreed to resolve its financial liabilities under all of these sections of the Coastal Act.

2. Application to Facts

This case, as discussed above, includes violations of the public access provisions of the Coastal Act. These provisions include, but are not necessarily limited to, Section 30210, which states in relevant part that "maximum access... and recreational opportunities shall be provided for all the people." As detailed above, only paying guests of Campland and Mission Bay RV Resort have been able to easily access the beaches and public parking there, even though the City required Respondent to provide public access to the beaches and designated parking at the resorts. Because Respondent's unpermitted development blocked and is blocking public access to the beach and public parking areas, it blocked and is blocking public access and therefore is in inconsistent with the provision of maximum public access to the beach in contravention of Section 30210 of the Coastal Act. In addition, the actions that Respondent undertook violated the City's lease requirements but also constituted development that required a CDP, but none was obtained. Therefore, these actions to block public access constituted unpermitted development in violation of the Coastal Act.

The following pages set forth the basis for the issuance of this Consent Agreement by providing substantial evidence that the Unpermitted Development meets all of the required grounds listed in Coastal Act Sections 30810 and 30811 for the Commission to issue Cease and Desist Orders and Administrative Penalty Actions.

a. Exceptions to Section 30821 Liability Do Not Apply

Under section 30821(h) of the Coastal Act, in certain circumstances, a party who is in violation of the public access provisions of the Coastal Act can nevertheless avoid imposition of administrative penalties by correcting the violation within 30 days of receiving written notification from the Commission regarding the violation. This "cure" provision of Section 30821(h) is inapplicable to the matter at hand. For 30821(h) to apply, there are three requirements, all of which must be satisfied: 1) the violation must be remedied consistent with the Coastal Act within 30 days of receiving notice, 2) the violation must not be a violation of a permit condition, and 3) the party must be able to remedy the violation without performing additional development that would require Coastal Act authorization.

A Notice of Violation was sent on June 26, 2020 to Respondent, informing them of the violations at both Campland and Mission Bay RV Resort, including unpermitted signs and guards restricting access at Campland, and unpermitted signs and physical items restricting access at Mission Bay RV Resort. However, Respondent's guards at Campland continued to restrict access to the beach and parking at Campland in the

months afterward. Thus, the violations on the Leased Tidelands remained unresolved after 30 days of receiving a Notice of Violation from the Commission. In addition, Section 30821(f) of the Coastal Act states:

(f) In enacting this section, it is the intent of the Legislature to ensure that unintentional, minor violations of this division that only cause de minimis harm will not lead to the imposition of administrative penalties if the violator has acted expeditiously to correct the violation.

Section 30821(f) is also inapplicable in this case. As discussed above and more fully below, the unpermitted restriction of public access here is significant both because it violated the terms of a City-issued lease of publicly owned tidelands, but also because restriction of public access to two beaches and two parking areas is an extremely significant harm under the Coastal Act. Therefore, the violation cannot be considered to have resulted in "de minimis" harm to the public.

b. Penalty Amount

Pursuant to Section 30821(a) of the Coastal Act, the Commission may impose penalties in "an amount not to exceed 75 percent of the amount of the maximum penalty authorized pursuant to subdivision (b) of Section 30820 for each violation." Section 30820(b) authorizes civil penalties that "shall not be less than one thousand dollars (\$1,000), [and] not more than fifteen thousand dollars (\$15,000), per day for each day in which each violation persists." Therefore, the Commission may authorize penalties in a range up to \$11,250 per day for each violation. Section 30821(a) sets forth the time for which the penalty may be collected by specifying that the "administrative civil penalty may be assessed for each day the violation persists, but for no more than five years."

In this case, Commission staff has evidence that Respondent was advertising a "private beach" at Campland on the Campland website as early as February 9, 2015. In addition, Commission staff has evidence that following Respondent's lease at Mission Bay RV Resort taking effect on June 30, 2019, Respondent maintained signs and obstructions that restricted access, and failed to install signs stating that the area was public. After receiving a report of violations, enforcement staff visited the resorts on February 20, 2020, and documented many unpermitted restrictions of public access. While these violations likely also occurred during the entire statutory period of five years during which administrative penalties may apply, because Respondent has agreed to amicably resolve this matter, and to provide public access programs and amenities which will greatly benefit the public and at a significant cost, as well as pay \$250,000 to the Violation Remediation Account, Commission staff recommends that the Commission approve the proposed resolution contained in the proposed Consent Cease and Desist Order and Consent Administrative Penalty.

As discussed immediately below, Commission staff thoroughly analyzed the factors enumerated by the Coastal Act in crafting the proposed Consent Administrative Civil Penalty calculation for the Commission's approval, and the Commission concurs with

staff's analysis. Under 30821(c), in determining the amount of administrative penalty to impose, "the commission shall take into account the factors set forth in subdivision (c) of Section 30820."

Section 30820(c) states:

In determining the amount of civil liability, the following factors shall be considered:

- (1) The nature, circumstance, extent, and gravity of the violation.
- (2) Whether the violation is susceptible to restoration or other remedial measures.
- (3) The sensitivity of the resource affected by the violation.
- (4) The cost to the state of bringing the action.
- (5) With respect to the violator, any voluntary restoration or remedial measures undertaken, any prior history of violations, the degree of culpability, economic profits, if any, resulting from, or expected to result as a consequence of, the violation, and such other matters as justice may require.

Applying the factors of Section 30820(c)(1), the violation at hand should warrant the imposition of substantial civil liability; violations have persisted on the Leased Tidelands for many years and the violations have meant that the public has been effectively denied access to two beaches and two free parking areas. This restricted access therefore disproportionately affected those who cannot afford to reserve campsites at Respondent's resorts, which are priced well above public campgrounds in the area. Therefore, the above factor weighs in favor of a significant penalty.

With regards to 30820(c)(2), the violation can be remedied going forward and compliance with this Consent Agreement will ensure that adequate public access is maintained at this location. For example, under the proposed Consent Agreement, Respondent is required to change their websites to explain that there are publicly available beaches and parking at these resorts, to train their employees to inform the public of the access that is required to be provided to the general public, and to install signs pointing the public in the direction of the beaches and publicly available parking areas. However, there are years of public access losses that can never be recovered, and many people have been denied public access to the coast that they cannot now regain, and therefore, a moderate penalty is warranted under this subsection.

Section 30820(c)(3) requires consideration of the resource affected by the violation in the assessment of the penalty amount. The resource affected by violation, public access to the beach, is an oft threatened and important resource across the State. Ensuring public access to all of California's beaches is promised to the people by the

State Constitution and is essential for implementing the Coastal Act, and this violation blocked many members of the public from reaching the beaches at Campland and Mission Bay RV Resort. The beaches in Mission Bay provide access opportunities for multiple inland counties that are home to millions of people of all socio-economic backgrounds that rely on public beaches for needed open space. Moreover, the population of southern California has continued to increase, creating additional significance for coastal access points. Therefore, an accessible beach here is a relatively sensitive resource in terms of access, and thus, a moderately high penalty is warranted under this factor.

Section 30820(c)(4) takes into account the costs to the state of bringing this action. In this case, mostly due to Respondent's willingness to work with Commission staff to resolve this case relatively quickly and without litigation, the costs have not been as significant compared to many other cases. Commission staff has spent less time in meetings and negotiations with Respondent relative to many of our other cases. After Respondent was notified of the violations in a Notice of Violation letter sent in June of 2020, Respondent has diligently and quickly worked to resolve this matter. While working to craft an amicable resolution took staff time, it has had benefits for the public. This has allowed the parties to resolve the violation without litigation, and to reach a settlement that includes injunctive measures that would not be as readily available without this settlement, such as providing a free camping program for underserved youth, and public amenities like more parking spaces, bathrooms, interpretive signs, and electric vehicle chargers, that all make it easier for the public to access these beaches. Taking all of this into account for calculating the penalty amount, the immediacy with which Respondent has agreed to comply with the Coastal Act and engage in the resolution process weighs towards a reduction from a more substantial penalty allowed under the statute.

Finally, Section 30820(c)(5), requires evaluation of the entity that undertook and/or maintained the unpermitted development and whether the violator has any prior history of violations, the degree of culpability, economic profits, if any, resulting from, or expected to result as a consequence of, the violation, and such other matters as justice may require. These violations started as least as far back as 2015 and may have persisted longer. In addition, Respondent did profit from some of the violations, in that Respondent advertised a "private beach" at Campland, an act that privatized and monetized a public beach, and discouraged non-paying guests from accessing the beach. In addition, Campland's failure to provide the 31 public parking spaces meant that Campland was likely able to charge \$20 per car for all public parking in those parking spaces or to rent those spaces for monthly storage, even though 31 of those public parking spaces should have been free. While Respondent did remove most of the signs restricting public access after receiving a Notice of Violation in June of 2020, and did install some new signs stating that there is public access in some of the areas, Commission staff still received some reports of Respondents' employees not allowing the public to access the free public parking and the beach.

In spite of this, though, Respondent has still been dedicated to quickly reaching an amicable resolution that provides new benefits to the public. Respondent has been much more amenable than most violators, and this has helped to minimize delays in reopening these public areas and resolving these violations.

Aggregating these factors, Commission staff concludes that a moderate penalty is justified here. Staff recommends that the Commission exercise its prosecutorial discretion and adopt staff's recommendation for the imposition of a monetary penalty in the amount of \$250,000, which will be paid to the Violation Remediation Account. As part of this consensual resolution, Respondent shall also provide additional measures to fully address this matter. In light of Respondent's unique ability to provide enhanced public access amenities at its facilities, Respondent shall provide a free camping program for underserved youth, as well as public amenities including, restrooms, interpretive signs, and electric vehicle chargers, in addition to a plastic pollution prevention program. Combined, Commission staff believes that this agreement provides a value to the public in excess of \$1 million.

Therefore, staff recommends that the Commission issue the Consent Administrative Penalty CC-21-AP-01 attached as **Appendix A** of this staff report.

(i) Consent Agreement is Consistent with Chapter 3 of the Coastal Act

The Consent Agreement, attached to this staff report as Appendix A, is consistent with the resource protection policies found in Chapter 3 of the Coastal Act. This Consent Agreement requires and authorizes Respondent to, among other things, cease and desist from conducting any further unpermitted development on the Leased Tidelands stemming from actions or inactions of Respondent that result in a change in the intensity of use of the Leased Tidelands, particularly in relation to the actions or inactions that decrease the public's ability to access the coast, and to perform other public access improvements as described in further detail, above. Failure to provide the required public access would result in the continued loss of public access, inconsistent with the resource protection policies of the Coastal Act.

Therefore, as required by Section 30810(b), the terms and conditions of this Consent Agreement are necessary to ensure compliance with the Chapter 3 policies of the Coastal Act.

E. California Environmental Quality Act

The Commission finds that issuance of these Consent Agreements, to compel the removal of the Unpermitted Development and the restoration of the Property, among other things, as well as the implementation of these Consent Agreements, are exempt from the requirements of the California Environmental Quality Act of 1970 (CEQA), Cal. Pub. Res. Code § 21000 *et seq.*, for the following reasons. First, the CEQA statute (section 21084) provides for the identification of "classes of projects that have been

determined not to have a significant effect on the environment and that shall be exempt from [CEQA]." *Id.* at § 21064. The CEQA Guidelines (which, like the Commission's regulations, are codified in 14 CCR) provide the list of such projects, which are known as "categorical exemptions," in Article 19 (14 CCR §§ 15300 *et seq.*). Because the Commission's process, as demonstrated above, involves ensuring that the environment is protected throughout the process, one of those exemptions apply here: the one covering enforcement actions by regulatory agencies (14 CCR § 15321).

Secondly, although the CEQA Guidelines provide for exceptions to the application of these categorical exemptions (14 CCR § 15300.2), the Commission finds that none of those exceptions applies here. Section 15300.2(c), in particular, states that:

A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

CEQA defines the phrase "significant effect on the environment" (in Section 21068) to mean "a substantial, or potentially substantial, adverse change in the environment." These Consent Agreements are designed to protect and enhance the environment, and they contain provisions to ensure, and to allow the Executive Director to ensure, that they are implemented in a manner that will protect the environment. Thus, this action will not have any significant effect on the environment, within the meaning of CEQA, and the exception to the categorical exemptions listed in 14 CCR section 15300.2(c) does not apply. An independent but equally sufficient reason why that exception in section 15300.2(c) does not apply is that this case does not involve any "unusual circumstances" within the meaning of that section, in that it has no significant feature that would distinguish it from other activities in the exempt classes listed above. This case is a typical Commission enforcement action to protect and restore the environment and natural resources.

In sum, given the nature of this matter as an enforcement action that will ensure the environment is protected throughout the process, and since there is no reasonable possibility that it will result in any significant adverse change in the environment, it is categorically exempt from CEQA.

IV. SUMMARY OF FINDINGS OF FACT

1. The Leased Tidelands that are the subject of this Consent Agreement are State tidelands granted to the city of San Diego and commonly known as Campland on the Bay, located at 2211 Pacific Beach Drive (approximately 40 acres of land and 5.5 acres of water space in Mission Bay Park, as described in the April 25, 2017 lease between the City of San Diego and Campland, LLC), and Mission Bay RV Resort, located at 2727 De Anza Road (approximately 70 acres of land and 6 acres of water space in Mission Bay Park, as described in the July 1, 2019 lease between the City of San Diego and Northeast MB, LLC), respectively, in San Diego, CA.

2. Respondent's leases with the City of San Diego required public access to these Leased Tidelands, including to the beaches and certain public parking areas. The current April 25, 2017 lease for Campland requires the resort to provide 31 free public parking spaces, provide public access to the beach, and to post signs stating that the area is public. The current July 1, 2019 lease for Mission Bay RV resort requires the resort to provide public access to the beach, provide free public parking in a large beachfront public parking area, and to post signs stating that the area is public.
3. Campland, LLC, Northeast MB, LLC are the respective lessees of the Leased Tidelands upon which the City has required public access to, and Gelfand Properties, LLC, and Terra Vista Management, Inc, are the respective managers of the Leased Tidelands.
4. Coastal Act Section 30810 authorizes the Commission to issue a cease and desist order when the Commission determines that any person has undertaken, or is threatening to undertake, any activity that (1) requires a permit from the Commission without securing a permit, or (2) is inconsistent with a permit previously issued by the Commission.
5. Unpermitted Development as defined above has been undertaken by Respondent and occurred without a CDP and is inconsistent with the City's lease requirements, including but not limited to: 1) placement of signs and other physical items of development, including, but not limited to, signs restricting access to the public and signs stating that the Leased Tidelands are private property, 2) placement of physical objects that blocked public access, including storage of dumpsters, trailers, and boats in public parking areas, and 3) undertaking other actions that have the effect of impeding or discouraging public access, including: use of private security guards and fences that block and/or impede public access to beaches, public parking areas, and public tidelands; advertising on Respondent's company website and Respondents' advertising on other websites that the beach at Campland is a "private beach;" and labeling the required public parking area as "guest parking" on the Mission Bay RV Resort website; all of which had the effect of changing the intensity of use of beaches, public parking areas, and public tidelands, and of access thereto.
6. All of the Leased Tidelands are located within the Coastal Zone. The unpermitted development is within a "Deferred Certification Area" and therefore required a CDP from the Commission, as required by the Coastal Act and the City of San Diego LCP. Since no CDP was obtained to authorize this development, the aforementioned development is unpermitted and constitutes a violation of the Coastal Act.
7. The statutory authority for imposition of administrative penalties is provided in Section 30821 of the Coastal Act. The criteria for imposition of administrative civil penalties pursuant to Section 30821 of the Coastal Act have been met in this case.

CCC-21-CD-01 & CCC-21-AP-01 (Campland, LLC and Northeast MB, LLC)

Sections 30820 and 30822 of the Coastal Act create potential civil liability for violations of the Coastal Act more generally.

8. The parties agree that all jurisdictional and procedural requirements for issuance of and enforcement of this Consent Agreement, including Section 13187 of the Commission's regulations, have been met.
9. The work to be performed under this Consent Agreement, if completed in compliance with the Consent Agreement and the plan(s) required therein, will be consistent with Chapter 3 of the Coastal Act.
10. The Respondent has agreed to assume the obligations of this Consent Agreement, which settles all Coastal Act violations related to the specific violations described in #5, above.
11. As called for in Section 30821(c), the Commission has considered and taken into account the factors in Section 30820(c) in determining the amount of administrative civil penalty to impose. The penalty agreed to in this settlement is an appropriate amount when considering those factors.

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Comment Letter O16: Friends of Rose Canyon, April 20, 2023

O16

From: Deborah Knight <rosecanyon@san.rri.com>
Sent: Thursday, April 20, 2023 5:01 PM
To: Sandel, Scott <SSandel@san.diego.gov>
Subject: [EXTERNAL] DeAnza Natural Amendment to the Mission Bay Park Master Plan

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Dear Mr. Sandel,

O16-1

Friends of Rose Canyon urges the City to select the option with the maximum restored wetlands - Rewind Mission Bay's "Wildest" option. The project must prioritize water quality in Mission Bay by adding a specific project objective "to improve the water quality of the study area and the bay through natural, resilient infrastructure.

O16-2

Please see attached Friends of Rose Canyon's comments on the PEIR and a map of the Rose Creek watershed. Rose Creek, the main fresh water tributary of Mission Bay, contains all the storm drain run off from a large, highly urbanized area.

Thank you.

Deborah Knight
Executive Director
Friends of Rose Canyon
858-526-1489 - cell
rosecanyon@san.rri.com

O16-1: This comment requests that the City of San Diego (City) prioritize the need for maximum wetland restoration. This comment will be provided to the City's decision-makers for their consideration. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is warranted.

Furthermore, this comment states that the PEIR should include a project objective that prioritizes improving water quality through natural resilient infrastructure. The project objectives listed in PEIR Chapter 3, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Section 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

O16-2: This comment provides an introduction to the comment letter and notes that Rose Creek is the main freshwater tributary of Mission Bay. PEIR Section 2.3.7, Hydrology and Water Quality, acknowledges that Rose Creek is the primary source of fresh water to the project area. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR for the project.



The mission of Friends of Rose Canyon is to protect, preserve and restore
Rose Canyon and the Rose Creek watershed.

April 19, 2023

**Comment on the Draft PEIR for the De Anza Natural Amendment to the Mission Bay Park
Master Plan**

**Attachment: Map of the Rose Creek Watershed (the area that drains into Mission Bay near
De Anza Cove)**

The city's draft EIR must prioritize water quality in Mission Bay by adding a specific project objective to "improve the water quality of the study area and the bay through natural, resilient infrastructure." The 1994 Mission Bay Park Master Plan demands it.

Prioritizing water quality is particularly important because the primary fresh water tributary of Mission Bay is Rose Creek, which enters Mission Bay near De Anza Cove. Rose Creek receives all the storm water run-off from the Rose Creek watershed, which includes a large, highly urbanized area.

The Rose Creek watershed consists of two branches:

- Rose Creek, which flows across MCAS Miramar and through Rose Canyon
- San Clemente Creek, which flows across MCAS Miramar and through San Clemente Canyon (Marian Bear Park)
- Just south of the I-5/SR-52 intersection, San Clemente Creek enters Rose Creek, which continues to flow south to become the main fresh water tributary of Mission Bay.

Both Rose Creek and San Clemente Creek receive huge inflows of untreated storm water run-off from many miles of highway (I-5, I-805, and SR-52), all the major roads and neighborhood streets, large expanses of parking lots, and intense residential, commercial and institutional development that covers a large urbanized area, including:

- much of the University Community Plan area (from Eastgate Mall south to SR-52)
- much of North Clairemont, some of which drains into San Clemente Creek along SR-52 and some of which drains into Rose Creek as it flows south to Mission Bay

In addition:

- The draft EIR is missing details on foreseeable impacts from sea level rise. How can we, the city, or anyone be expected to determine the best land-use plan without knowing how climate change will affect our park?
- The city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035. The Wildest plan provides the city with one of the best ways to achieve this goal, but the draft EIR for the De

O16-3: These comments are duplicates from comment letter O8 (Friends of Rose Canyon comment letter). Please refer to responses to comments O8-1 through O8-6.

O16-3

O16-3
cont.

Anza Natural plan fails to evaluate its proposals against the city's own Climate Action Plan goals.

- The city's proposal fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. All San Diegans, including our Kumeyaay neighbors and those in underserved communities, will benefit with access to a vibrant tidal marsh.

Sincerely,

Deborah Knight
Executive Director

Comment Letter O17: Friends of Rose Creek, April 20, 2023

O17

From: [Friends of Rose Creek](#)
To: [PLN_PlanningCEQA](#)
Cc: [Sabdel, Scott](#)
Subject: [EXTERNAL] Comments on De Anza Natural Draft PEIR
Date: Thursday, April 20, 2023 11:11:50 AM
Attachments: [FGRC_DFEIR_CommentLetter_Final-20230423.pdf](#)
[KarinZirkCommentsMBMMPA_20230417.pdf](#)

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O17-1: This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

O17-1

Please find comments on the De Anza Natural Draft PEIR attached in PDF format.
Please advise immediately if there are any technical difficulties with the PDF documents.

Warmly,

Karin Zirk, Ph.D. (she/her/hers)
Executive Director
Friends of Rose Creek
*** Connecting Our Communities ***
<https://SaveRoseCreek.org>
<<...>> <<...>>



Friends of Rose Creek *
 "Connecting Our Communities"
 4629 Cass Street #188
 San Diego CA 92109



April 20, 2023

Via email transmission to: PlanningCEO@sandiego.gov.

Attn: Heidi Vonblum
 Planning Director
 City of San Diego Planning Department
 9485 Aero Dr, M.S. 413
 San Diego, CA 92123

RE: De Anza Natural Draft Programmatic Environmental Impact Report (Draft PEIR)
 Comments

Dear Ms Vonblum:

O17-2 | Thank you for the opportunity to comment on the City of San Diego's (City) Draft Programmatic Environmental Impact Report (PEIR) for De Anza Natural. The Friends of Rose Creek cares for, enhances, and advocates for the protection of Rose Creek, which while not yet a park, provides critical park services to a diverse community of workers, military personal and their families, as well as bird watchers and bicyclists from around the county. Our vision is for lower Rose Creek to be an open space park providing recreational and learning opportunities and a clean, healthy, aesthetically pleasing environment for residents, visitors, businesses, and native plants and animals, while serving as an accessible link for bicyclists, pedestrians, and wildlife to move between Rose Canyon Park, Marian Bear Park, Mission Bay Park, and surrounding communities.

O17-3 | As a point of background, over 4,000 acres of natural wetlands and mud flats were destroyed in the making of Mission Bay Park. The historic Rose Creek Wetlands stretched from what is now the University of California's Kendall-Frost Marsh Preserve almost to the southbound on-ramp to I-5 on Mission Bay Drive as shown in this blow up of an 1857 map of the area. The darker shaded area within the blue circle showing the historic Rose Creek Wetlands with the railroad tracks being the line to the east and Crown Point Shores being the peninsula to the west.

** A member of the Rose Creek Watershed Alliance
 * A Friends Group of San Diego Canyonlands, Inc.
 Visit us on-line at <http://www.saverosecreek.org>*

O17-2: This comment discusses the Friends of Rose Creek's mission and vision. The City of San Diego (City) appreciates the Friends of Rose Creek's participation in the review of the PEIR for the project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O17-3: This comment summarizes the history of the Rose Creek wetlands and does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O17-3
cont.



O17-4

The Friends of Rose Creek have been the primary caretakers for the creek and salt marsh since 2004. We have been involved in the planning efforts for the northeast corner for over a decade. We had representation on the Mission Bay Park subcommittee for the De Anza Revitalization Plan during the first iteration of the planning efforts for this area. We have been participated in countless meetings beginning with the first planning effort and now this enhanced De Anza Natural Plan.

Also, we have been involved with the plan to restore the historic wetlands at the mouth of Rose Creek headed by San Diego Audubon for years as well. We are part of the ReWild Mission Bay Coalition and as such support 100% the comments provide by the Coalition in their letter to this draft PEIR, of which we are a signatory.

The following are specific comments on the Draft Programmatic Environmental Impact Report (Draft PEIR).

Project goals and objectives

O17-5

We have identified the following deficiencies with the project goals in the draft PEIR:

Improving water quality is not listed as a project objective despite being identified in the Mission Bay Master Plan as one of the priority objectives.

- a. “[F]oremost in consideration should be the extent to which the Special Study Area can contribute to the Park’s water quality. In fact, additional wetlands creation must be considered as part of the SSA” (Mission Bay Park Master Plan page 53).

How will compliance with the Mission Bay Master Plan’s directive to improve water quality be measured?

Where is the analysis to show metrics regarding estimated water quality improvement for each of the alternatives analyzed for the Draft PEIR?

O17-6

Project objective 5 only identifies “De Anza Cove” as part of the objective. This Draft PEIR covers the entire northeast corner of Mission Bay Park and as such the objective should be modified to reference the planning area as a whole, not just the cove. Furthermore, the alternatives analysis should be performed against the entire planning area and not just the cove.

O17-4: This comment provides a summary of the Friends of Rose Creek’s involvement in the De Anza Revitalization Plan and De Anza Natural planning process. The comment also provides support for the comments provided by the Rewild Mission Bay Coalition. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O17-5: This comment states that improving water quality is not listed as a project objective, and questions how compliance with the MBPMP directive to improve water quality will be measured. The project objectives listed in PEIR Chapter 3, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Chapter 5.7, Hydrology and Water Quality, for a discussion of how the proposed project’s design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

The comment also asks for an analysis showing metrics regarding water quality improvements for the PEIR alternatives. An analysis of potential impacts related to water quality were addressed for each alternative in PEIR Chapter 8.0, Alternatives. PEIR Chapter 8.0 includes a general description of each of the alternatives, along with a discussion of their ability to reduce the significant environmental impacts associated with the project. In accordance with the California Environmental Quality Act

(CEQA) Guidelines, Section 15126.6(b), the alternatives discussion should focus on those alternatives that, if implemented, could eliminate or reduce any of the significant environmental impacts of a project. The alternatives are evaluated to determine if they would eliminate any significant adverse environmental impacts or reduce those impacts to below a significant level. Project-related and cumulative impacts are those identified prior to the incorporation or implementation of any mitigation measures. Therefore, no revisions to the PEIR are warranted.

O17-6: This comment states that project objective 5 only identifies “De Anza Cove” as part of the objective and that it should reference the planning area as a whole. The project objectives, which are defined in PEIR Chapter 3.0: Project Description, apply to the entire project area. As described in PEIR Chapter 3.0, the project area is in the northeastern corner of Mission Bay Park in the City and consists of approximately 314 acres of land and approximately 191.2 acres of open water for a total of approximately 505.2 acres. The project area includes the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP), Campland on the Bay (Campland), Pacific Beach Tennis Club athletic fields, Mission Bay Golf Course and Practice Center, and De Anza Cove area, including a vacated mobile home park and supporting infrastructure, the Mission Bay RV Resort, a public park, public beach, parking, and water areas. As described in PEIR Chapter 3.0, the De Anza Cove area is defined as the area south of North Mission Bay Drive and east of the Rose Creek inlet. The land uses proposed in this area include expanded marshland/habitat, low-cost visitor guest

accommodations, regional parkland, open beach, boat facilities and clubhouse, multi-use paths, and upland (dune, sage) and buffer areas. The project area also encompasses the KFMR/NWP. No revisions to the PEIR are warranted.

This comment also states that the alternatives analysis should be performed for the entire project area and not just De Anza Cove. As discussed in PEIR Chapter 8.0, the performance of an alternative relative to a project is evaluated to determine the “comparative merits of the alternative” (CEQA Guidelines, Section 15126.6[a]). The alternatives analysis is based on a comparison to the project’s impacts within the project area, which includes De Anza Cove. No revisions to the PEIR are warranted.

- O17-7 Why were active and passive coastal dependent recreational activities not considered when analyzing alternatives?
- Why is non-coastal dependent active recreation prioritized over coastal dependent active recreation in an aquatic park?

Project Goals and Alternatives Analysis

- O17-8 The project goals that have been included are vague and do not provide criteria for determining which of the analyzed alternatives adequately meet the project objectives.
Specifically, we have looked at the provided analysis eliminating the “ReWild Wildest” alternative and will step through the problematic points now:
The rationale for elimination of the “Wildest” plan is due to a limited analysis of Project Goals 1, 2 and 5 is not supported by the facts.
 - If a diversity of uses is required in every corner of the park, the City is failing that objective with the land allocated to Sea World, marinas, and hotels where certain uses are prioritized at the expense of other uses, interests, incomes and cultures. In order to create a balance within the park as a whole, more nature-based experiences need to be created. Currently all recreation types exist in a distributed fashion within the park. Therefore, we believe that the same should hold true for nature-based activities.
- Why is a diversity of uses required for the north east corner of Mission Bay Park when it is not required for other areas such as Crown Point Shores and/or Sail Bay where no permanent commercial leaseholds exist?
In regards to the project objectives, the City has precluded certain types of active and passive recreational opportunities from its alternatives analysis. Therefore, we believe that the “ReWild Wildest” alternative meets all the project goals.
The “Wildest” alternative was eliminated due to what we consider an inadequate analysis of objectives 1, 2 and 5. Following is our analysis of the “Wildest” alternative against these three objectives.
Reasons “Wildest” meets Project Object 1:
 - All San Diego communities have experienced barriers to accessing salt marsh and tidal wetlands for kayaking, fishing, bird watching, exploring natural coastal resources, and harvesting of mud creatures due to the historic destruction of almost 4,000 acres of salt marsh in Mission Bay Park.

O17-7: This comment questions why active and passive coastal-dependent recreational activities were not considered when analyzing alternatives. As stated in CEQA Guidelines Section 15126.6, “An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” PEIR Chapter 8.0, Alternatives, identifies a reasonable range of alternatives and evaluates four alternatives that were selected for additional analysis, in addition to the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative that were considered but rejected for their failure to meet the project objectives. In line with the requirements of CEQA Guidelines Section 15126.6, Chapter 8: Alternatives focused on analyzing which alternatives (1) meet most of the project objectives, (2) are feasible, and (3) avoid or substantially lessen the significant impacts resulting from the project. No revisions to the PEIR are warranted.

O17-8: This comment states that the project goals are vague and do not provide criteria for determining which of the analyzed alternatives adequately meet the project objectives. The project’s objectives, which are defined in PEIR Chapter 3.0: Project Description, explain the underlying purpose of the project and are used to develop a reasonable range of alternatives in line with the requirements of CEQA Guidelines Section 15124.

- Wetlands provide opportunities for recreational experiences in a coastal salt marsh that are not currently available in Mission Bay Park including kayaking/canoing/stand-up paddle boarding/bird and other wildlife watching — all coastal dependent activities.
- The California coastal salt marsh zone is a distinct and valuable natural resource within the Coastal Zone that is of vital and enduring interest to all the people and exists as a delicately balanced ecosystem per the California Coastal Commission.
- The “Wildest” plan provides new coastal-dependent active recreational opportunities not currently available in Mission Bay Park. Kayaking/paddle boarding in a salt marsh and hiking in nature are all active recreation activities not readily available in Mission Bay Park.
- In order to provide equitable access, salt marshes must be located in many accessible spots of San Diego. Mission Bay Park has a level of public transit access that is not available for many other salt marshes in the county.

How does the Draft PEIR address these points?

Why in the analysis are coastal dependent access and active recreation considered less-important than non-coastal dependent active recreation?

Reasons “Wildest” meets Project Object 2:

- De Anza Cove was a manufactured and artificial topography created after local tribal nations were excluded from their traditional villages and lifestyle in the areas of Mission Bay and Pacific Beach.
- For millennia, local tribal nations engaged with the salt marshes that once existed throughout much of Mission Bay including the historic Rose Creek salt marsh near the location of the village of “Wehap Maw.” The salt marsh plants, birds, wildlife, and fish are what constitutes **reconnection**, not access to something that has only existed for a short period of time.
- Local indigenous tribes were excluded from their traditional practices by the destruction of the historic Rose Creek wetlands.
- Therefore, the “Wildest” plan best meets Object #2 as restores the habitat more closely to how it had existed pre-European contact.
- The City of San Diego should engage with local indigenous communities to define for themselves what “reconnection” looks like not inform these communities what or how “reconnection” should occur.

How does the City of San Diego propose to incorporate the perspectives of local indigenous communities to define the proposed alternatives and their desired activities within the space?

What outreach was done as part of the Draft PEIR and what outreach will be done before a Final PEIR is completed?

How will the results of outreach to local indigenous communities modify the alternatives in the PEIR?

Further this comment states that the ReWild Mission Bay “Wildest” alternative was eliminated due to what the commenter considers an inadequate analysis of project objectives 1, 2, and 5 and explains each point. The comment states that the “Wildest” alternative provides new coastal-dependent active recreational opportunities not currently available in Mission Bay Park, restores the habitat more closely to how it had existed pre-European contact, offers visual access, and presents non-motorized multimodal access. These points are programmatically addressed further. The “Wild,” “Wilder,” and “Wildest” alternatives are discussed in PEIR Section 8.2, Alternatives Considered and Eliminated. The MBPMP calls for a “balanced approach” with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild Mission Bay alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parkland, boating, and low-cost visitor guest accommodations. The project proposes 146.5 acres of active recreation, regional parkland, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

The ReWild Mission Bay “Wild” and “Wildest” alternatives would not fully consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5) because they lack sufficient site areas for a balance of land uses, including enough site area for recreation and low-cost visitor guest accommodations,

O17-8
cont.

Reasons “Wildest” meets Project Object 5:

- The City of San Diego’s Environmental Sensitive Lands (ESL) regulations specific that the goal is to maximize physical and VISUAL public access to coastal resources. However, the project objectives as written do not give credit to alternatives that provide “visual public access.”¹
- Wetlands overlooks and kayaking in wetlands are types of “visual public access” that are incorporated in the “Wildest” alternative.
- We strongly urge the City to look at the types of activities available with the park as a whole and see that currently, nature orient opportunities are very limited. Mission Bay Park already contains extensive beach access. A “beach” is only one type of coastal access and providing opportunities for other types of coastal access is critical to ensuring Mission Bay Park serves as diverse a range of interests as possible.
- Increasing the amount of lower, middle and upper wetlands as well as upland habitat diversifies the types of both active and passive coastal-dependent recreational uses within Mission Bay Park as a whole by providing opportunities for a wide variety of bird watching, kayaking/stand-up paddle boarding, mud-flat exploring, shell-fish digging, fishing, and nature-based exploration activities for visitors of all ages and cultures.
- By increasing the acreage of natural habitats, more opportunities will be created for coastal-dependent active (kayaking, walking etc.), passive (bird watching, exploring the daily changes in the salt marsh,) and other nature based recreational activities without threatening the sustainability of these natural habitats.
- Greater acreage of natural habitats provides more people access. Furthermore, appropriately situated and raised boardwalks will allow land-based and mobility impaired visitors to explore nature up close and personal.
- More wetlands can lead to more robust fisheries that support all types of fishing activities for people from a wide range of cultures, ages, and interests. Please include an analysis of the current usage of Mission Bay Park for fishing and what percentage of those who fish in Mission Bay supplement their diet with said fish. Many communities are dependent on fishing to supplement their food sources.

Why is visual coastal access not part of the project objectives?

Why is there a requirement for this corner of Mission Bay Park to handle the types of uses not required of all corners of Mission Bay Park? (Crown Point Shores and Sail Bay for examples).

How will a smaller natural habitat footprint lead to a reduction in the number of visitors to the natural habitat? Please provide an analysis of the alternatives with the average number of daily visitors that can be sustained without damages to the resources.

Where is the analysis showing estimated increases of fish species by alternative?

¹ City of San Diego, 2022b. Environmentally Sensitive Lands Regulations. Accessed April 2023. <https://docs.sandiego.gov/inumicode/MuniCodeChapter14/Ch14Art03Dvision01.pdf>.

and as a result, they would also not provide enough equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access (project objective 1). The “Wilder” and “Wildest” alternatives would also fail to meet project objective 5 because they would reduce the amount of area available for aquatic recreation uses, such as the enjoyment of open beach sand activities and boating. These alternatives would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2) like the project would, and while these alternatives would provide bike and pedestrian pathways, they would not prioritize public access and connectivity to the extent that the project would or activation of the shoreline (project objective 6). Compared to the project, the three ReWild Mission Bay alternatives would not enhance public access or provide equitable access to De Anza Cove because of how those plans laid out the habitat design to reduce access to the cove’s shorelines. Therefore, while these alternatives would meet project objectives 3 and 4 by incorporating climate adaptation strategies and embracing responsibility and stewardship of the environment, they would not meet most of the project objectives. Thus, they have been eliminated from further consideration. No changes to the PEIR alternatives analysis are warranted.

The comment asks how the results of public outreach, including input from local Indigenous communities, will modify the PEIR alternatives. As discussed in PEIR Section

O17-8
cont.

O17-8 cont. Reasons “Wildest” meets project objective 6

- Strategy 5 of the Climate Action Plan emphasize multimodal transportation. However, in the context of Mission Bay Park non-motorized watercraft and foot travel constitute sustainable multi-modal travel.

Why is non-motorized watercraft transportation excluded from the types of multi-modal transportation analyzed in an aquatic setting?

How does including non-motorized watercraft transportation change the analysis of the sustainable alternatives against the objective 6 for the Wildest alternative?

Exclusion of Rose Creek in the analysis

O17-9 The current tidal salt marsh in Rose Creek stretches from Mission Bay near the heel of the De Anza “boot” upstream to Garnet Avenue.

Because Rose Creek is the primary source of fresh water inflows into Mission Bay Park overall and specifically in the northeast corner, how does the absence of analysis from the Draft PEIR of Rose Creek’s water quality constrain the conclusions drawn in the Draft PEIR?

Please include an analysis of the Rose Creek lower salt marsh’s (what the City of San Diego calls the “inlet” and which is downstream of Grand Avenue) and its relationship to the rest of this project. Excluding the creek from the analysis creates a huge gap in understanding how the alternatives will engage with the fresh water inputs especially when the location of the proposed wetlands restoration is specifically situated to be at the source of fresh water inflows.

O17-10 How does the Wildest alternative buffer downstream of the existing North Mission Bay Drive preclude it from meeting the project objectives when the City’s preferred alternative also includes a buffer along the existing lower Rose Creek salt marsh (what the City of San Diego calls the “inlet.”). Please see Karin Zirk’s attached comments to the Mission Bay Master Plan Amendment.

Climate Action Plan (CAP)

O17-11 According to the Draft PEIR, the “...project also supports Strategy 5, Resilient Infrastructure and Healthy Ecosystems, identified in the CAP, as it includes the restoration and enhancement of wetlands, which have been identified in the City’s Climate Resilient SD Plan as important habitat to mitigate flooding, improve water quality, provide important habitat, absorb wave energy, and minimize coastal erosion.”

However, in the alternatives analysis, no information is provided on how well each of these alternatives fulfill this strategy.

Why does the Draft PEIR not include analysis of the alternatives in regards to Strategy 5 of the CAP?

5.6.3.3, Issue 3: Tribal Cultural Resources, Tribal consultation in accordance with Assembly Bill 52 was conducted in 2019 with the Jamul Indian Village and the Lipay Nation of Santa Ysabel. Additional Tribal consultation pursuant to Assembly Bill 52 was also conducted in 2023. During formal and informal discussions, the local Native American Kumeyaay community has expressed a high level of interest with regard to potential impacts to known resources in and around the project area. Therefore, the PEIR includes a mitigation measure to reduce impacts on inadvertent discoveries to a less than significant level. As discussed in PEIR Chapter 3.0, the project would also include an Interpretive Nature Center, which would foster opportunities for members of local Tribal nations to reconnect to De Anza Cove.

O17-9: This comment requests an analysis of the Rose Creek lower salt marsh and its relationship to the rest of the project. PEIR Chapter 2.0, Environmental Setting, establishes the analyzed project area, which is identified as the northeastern corner of Mission Bay Park. The project focuses on habitat enhancements within the boundaries of the project as outlined in PEIR Chapter 2.0. As discussed in PEIR Section 2.3.7, Hydrology and Water Quality, Rose Creek is a major drainage of the area north of Mission Bay and is the primary source of fresh water to the project area. As discussed in PEIR Section 5.7, Hydrology and Water Quality, due to the project’s location within and adjacent to Rose Creek and Mission Bay, the project would have the potential to result in long-term operational pollutants associated with components of the project, such as low-cost visitor guest

accommodations, parking areas, and street improvements, that would introduce potential pollutants, including sediments, heavy metals, nutrients, trash and debris, oxygen-demanding substances, oil and grease, pesticides, and bacteria and viruses. However, in accordance with the City's Stormwater Standards Manual, the project is a priority development project that is required to incorporate post-construction (or permanent) Low Impact Development site design, source control, and treatment control best management practices into the project's design. The types of best management practices that could be implemented are listed in PEIR Table 5.7-1, Recommended Best Management Practices. The best management practices are preliminary recommendations and would be refined and implemented as part of final project design and monitoring programs for future project activities consistent with the project in accordance with the City's Stormwater Standards Manual that requires the preparation of a Stormwater Quality Management Plan. The Stormwater Quality Management Plan must accompany the final design of subsequent project activities to ensure that runoff generated by the project is adequately captured/treated per applicable federal, state, and local regulation.

In addition, the project proposes water quality design features along the edges of active recreation areas. Proposed water quality detention basins would be different sizes and would capture and treat stormwater before flowing into Mission Bay. New water quality detention basins would be located to treat the entire project area in accordance with local and state

requirements. Water quality detention basins would be designed with a sediment forebay, a height-appropriate embankment specific for each area of treatment, and a base to reduce sediment and erosion at the outflow. Native plants would be used to reduce sediment and total suspended solids from stormwater. Additional water quality-enhancing features would include vegetated areas bordering all development to reduce stormwater contamination, including debris and sediment, from reaching Mission Bay.

Revegetating the edges of Rose Creek and along the “boot” of De Anza Cove with marsh, wetland, and upland native plants would create another water quality-enhancing feature. In addition, “green” infrastructure such as constructed oyster beds would be implemented at shorelines where oyster colonization is feasible. Because oysters feed by filtering algae from the water, they function as a natural filter and improve water overloaded with nutrients. Therefore, the PEIR adequately addresses water quality at the programmatic level, and no changes to the PEIR are warranted.

O17-10: This comments questions why the ReWild Mission Bay “Wildest” alternative buffer downstream from the existing North Mission Bay Drive precludes it from meeting the project objectives. Please refer to response to comment O17-8 for the rationale for the rejection of the “Wildest” alternative.

O17-11: This comment states that the alternatives analysis does not provide information on how each alternative fulfills the City’s Climate Action Plan (CAP) Strategy 5, Resilient

Infrastructure and Healthy Ecosystems. PEIR Chapter 8.0 evaluates four alternatives that would reduce impacts compared to the project (No Project/No Build Alternative, Wetlands Optimized Alternative, Enhanced Wetlands/Optimized Parkland Alternative, and Resiliency Optimized Alternative). The PEIR surpasses CEQA's requirements by providing an evaluation of the Wetlands Optimized Alternative at an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b). PEIR Chapter 8.0 states that the Wetlands Optimized Alternative would further the City's climate resiliency goals related to healthy ecosystems by increasing wetland habitat restoration. The alternatives are evaluated to determine if they would eliminate any significant adverse environmental impacts or reduce those impacts to below a significant level. PEIR Chapter 8.0 specifically states that the Wetlands Optimized Alternative would particularly support implementation of CAP Strategy 5 because it would expand and restore wetlands throughout the De Anza Cove area. Additional analysis of the Wetland Optimized Alternative is provided in PEIR Table 8-2, General Plan and Climate Action Plan Consistency – Wetlands Optimized Alternative. In addition, PEIR Chapter 8.0 concludes that the Enhanced Wetlands/Optimized Parkland Alternative and the Resiliency Optimized Alternative would protect, improve, and enhance natural resources in Mission Bay as called for in the Mission Bay Park Natural Resource Management Plan and would include wetland enhancement and restoration activities in support of the City's CAP Strategy 5, which promotes the creation of resilient infrastructure and healthy ecosystems. Compared to the project, impacts were

determined to be similar and less than significant in regard to consistency with the City's CAP. Therefore, PEIR Chapter 8.0 adequately analyzes consistency with the City's CAP Strategy 5, as requested in the comment and is appropriate for this programmatic level of environmental review. No revisions to the PEIR are warranted.

As discussed in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. The PEIR acknowledges that the City will evaluate future detailed GDPs for future projects as they are developed. A GDP, as defined in City Council Policy 600-33, is a Conceptual Master Plan that identifies the activities and amenities to be included in a park. As described in PEIR Section 1.4.1, Type of PEIR, GDPs will be developed over time and provide precise engineering and construction plans for the various elements of the project. Once the project design has been finalized and prior to approval, the City will route the project through the Public Project Assessment process, including the preparation of the appropriate environmental documentation in accordance with CEQA. The City also acknowledges that, due to the lack of detail and site design in the PEIR, many future projects will undergo site-specific CEQA review, which is the appropriate time to evaluate site-specific impacts. Therefore, the project is adequately analyzed in the PEIR, and no revisions to the PEIR are warranted.

O17-11 cont. How do each of the alternatives address Strategy 5 of the CAP?
In tabular format please provide the metrics for flood mitigation, water quality improvement, minimization of coastal erosion, and absorption of wave energy for each alternative considered in the Draft PEIR (even those currently eliminated from consideration)?

Implementation and maintenance costs in the alternatives analysis

O17-12 As we all recognize, the City of San Diego does not have unlimited funding to support maintenance of the natural lands currently under their jurisdiction, let alone newly restored habitats. Therefore, it is critical that not only the implementation costs are included as part of the alternatives analysis, but also the estimated maintenance costs so that the public and elected officials can make an informed decision.

The City of San Diego's Climate Action Implementation Plan² (CAIP) requires an "Implementation Cost Analysis for all climate action projects. Restoring seven hundred acres of wetlands by 2035 is part of Strategy 5 of the Climate Action Plan. The Draft PEIR does not include cost estimates for maintenance of any of the alternative's natural habitat components. Therefore, there is no guarantee that the City will have funding for the active maintenance identified in the Draft PEIR.

We respectfully request that each alternative include annual maintenance costs and funding sources for required maintenance including the "Wetlands Optimized" and ReWild Mission Bay's "Wildest" alternative to prevent restored wetlands from degrading due to lack of maintenance funding.

The Draft PEIR should identify where and what type of hardened and natural shoreline treatments are proposed for all the alternatives as this will impact the maintenance costs as well as the implementation costs.

Relationship of the Draft PEIR to the project-specific development plans

O17-13 The City of San Diego states this is a Draft Programmatic Environmental Impact report and that the land use development processes will be used to create detailed environmental analysis on a project-by-project basis.

However, committing to a natural habitat design before full sea-level rise, water quality, and erosion analysis has been done creates a significant challenge for this project. A subsequent detailed analysis could determine that a complete or partial redesign of the area might be required in order to maintain 80 acres of salt marsh in 2100 per the City's commitment to the Regional Water Quality Control Board.

² See page 48 of https://www.sandiego.gov/sites/default/files/draft_climate_action_implementation_plan_022823.pdf

O17-12: This comment requests that each alternative include annual maintenance costs and funding sources for required maintenance for the restored wetlands. CEQA Guidelines Section 15131, specifically states that "economic or social effects of a project shall not be treated as significant effects on the environment." CEQA defines "environment" as "the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance" (California Public Resources Code, Section 21060.5). An EIR project analysis is limited to those socioeconomic issues that could result in a direct change to the physical environment. Therefore, the economic cost of the project is not required to be analyzed in the PEIR. No revisions to the PEIR are warranted.

O17-13: This comment recommends that a full wetlands analysis be included in the Final PEIR to include sea level rise modeling, an analysis of estimated quantifiable improvements to water quality in Mission Bay Park, and an analysis of erosion caused by sea currents to determine impacts on restored wetlands. Please refer to response to comment O17-9. The project would expand the project area's natural habitat and improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect the City against the risk of climate change in line with the City's Climate Resilient SD Plan. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project.

O17-13
cont.

This would not only require a redesign of the wetland and upland habitats but also a potentially significant redesign of the active recreation and low-cost visitor accommodations acreage and foot print. Therefore, it makes much more sense to provide at least the full wetlands analysis in the Final PEIR including sea-level rise modeling, analysis of estimated quantifiable improvements to water quality in Mission Bay Park, and an analysis of erosion caused by sea-currents as well as motorized boat from the adjacent public boat launch ramp to determine these impacts on restored wetlands both with and without hardened shoreline treatments.

In what order will the City of San Diego do the details environmental analysis for each of the proposed land uses within the project area?

How will an iterative approach be applied to the wetlands design process?

Non-Coastal Dependent Active Recreation Uses

O17-14

The Draft PEIR itself recognizes that there is a limited amount of space and many competing uses. However, if the goal of the De Anza Natural plan is to provide the highest number of people the most opportunities for non-coastal dependent active recreation, then a density per recreation hour per acre study needs to be done in order to prioritize those activities that serve the most people per hour per acre in order to provide the most hours of active land-based recreation to the general public.

Please provide an analysis in the Final PEIR of how many people per day per acre on a weekend use the golf course, sports fields, and tennis courts to determine how to maximize non-coastal dependent recreation in the available space.

How will technical and acreage-based conflicts between the proposed land uses be resolved?

Which land uses will have priority?

How does the City propose to identify non-coastal dependent active recreation priorities within the acreage dedicated to active recreation in the Draft PEIR?

How does the plan propose to handle an iterative design approach?

How will commitments to low-cost visitor accommodations and land-based non-coastal dependent active recreation be adjusted when the detailed wetlands restoration analysis is completed?

How will the impacts of erosion on the different alternatives alter the wetlands footprint?

If erosion is significant, what is the plan for "managed retreat" of the low-cost visitor accommodations and non-coastal dependent active recreation to allow the salt marsh to migrate as necessary.

O17-14: This comment poses several site-specific questions regarding non-coastal-dependent active recreation uses and active recreation users. Please refer to response to comment O17-11, which states that no development is currently being proposed and that future project-specific design review would occur under the City's GDP process. The CEQA Guidelines state when a PEIR may be prepared. As explained in the PEIR, CEQA Guidelines, Section 15168, states that "A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) Geographically, (2) As logical parts in the chain of contemplated actions, (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

Furthermore, CEQA Guidelines, Section 15146, defines the degree of specificity necessary in an EIR: "The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." Therefore, an EIR for a project, such as the adoption of a Master Plan Amendment, should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow. Therefore, the PEIR does not serve as project-level environmental analysis for any specific development project, and adequate information is not available at this time to address potential future site-specific impacts of the project. No revisions to the PEIR are warranted.

User-base for Non-Coastal Dependent Active Recreation

The Draft PEIR identifies their perception of who has commented on the various plans. However, in order to address Vehicle Miles Traveled (VMT) and the needs of non-coastal dependent active recreation that is not coastal dependent in what is primarily an aquatic park, the City of San Diego should do an analysis of users of Mission Bay Park and the zip codes in which they live to determine VMT impacts on locating excessive non-coastal dependent active recreation in this area.

How many people use the sports fields, tennis club and golf course from 5 miles away, from 10 miles away, and/or from 25 or more miles away? Without this information, it is not possible to determine how much non-coastal dependent active recreation is required for the Community Park designated lands within the planning area.

Furthermore, high level data should be provided in the Final PEIR indicating who, when and from where people have supported different land uses for this project planning area. A general statement is insufficient and must be supported by data and methodologies used to aggregate the data and remove on-line duplicate submissions in order to be statistically significant. Including a statement that says "the data is statistically significant" is completely inadequate.

What are the number and percentages of people who have supported different land-uses at each meeting and through online outreach by date?

What processes and methodologies have been used by the City to aggregate the data and remove on-line duplicate submissions.

Conclusion

This Draft PEIR is a good start, but there is still much work to be done. We look forward to continuing to collaborate with the City of San Diego to restore the Historic Rose Creek wetlands and to provide appropriate active recreation (both coastal and non-coastal dependent) to San Diegans and visitors alike.

On behalf of the Friends of Rose Creek,



Karin Zirk, Ph.D. (she/her/hers)
Executive Director
Friends of Rose Creek
*** Connecting Our Communities ***
<http://www.saverosecreek.org>

O17-14
cont.

O17-15

O17-15: This comment is a closing comment and states that the PEIR is a good start but there is still work to come. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

Karin Zirk
4629 Cass Street #188
San Diego CA 92109

April 17, 2023

City of San Diego Planning Department

RE: Proposed Amendment to the Mission Bay Parks Master Plan and De Anza Natural

Thank you for the opportunity to provide comments on the Mission Bay Park Master Plan (MBPMP) Amendment. I have been involved with this project for over a decade either through my service on the Mission Bay Park De Anza Revitalization subcommittee or via my involvement with the Friends of Rose Creek.

First off, releasing a document sans page numbers makes it difficult for people to reference their comments based on sections of the document. I will try my best but I strongly recommend the use of page numbers in documents to help us all communicate more effectively.

Although the San Diego River once flowed into False Bay and created a huge wetlands complex at the southeast corner of what is now Mission Bay Park, Rose Creek is now the largest source of fresh water inflows into Mission Bay and the best location for substantial wetlands restoration. I strongly believe that wetlands restoration is the best use of this area within Mission Bay Park.

As you can see from this map from 1857, the historic Rose Creek wetlands stretched from Kendall-Frost Marsh in the west almost to what is now Interstate 5. The map below shows Crown Point to the left and the railroad tracks to the east.



The historic Rose Creek salt marsh and wetlands stretched from what is today's Kendall-Frost Marsh almost to the I-5 southbound on ramp on Mission Bay Drive across the northeast corner of Mission Bay and into what are now schools and residential areas.

O17-16: This comment is an attachment that includes comments on the Proposed Amendment to the Mission Bay Parks Master Plan and De Anza Natural. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O17-16

In the 1950s and 1960s, the City of San Diego destroyed over 4,000 acres of nutrient rich habitat for wildlife, migratory and local birds, as well as fish, and mud creatures that are at the bottom of the food chain negatively impacting our fisheries. I am asking for a tiny portion of that to be restored. Therefore, it is time to focus on wetlands restoration in the northeast corner of Mission Bay to restore a portion of the historic Rose Creek wetlands.

In regards to: EXECUTIVE SUMMARY: Section III tourist attractions.

I take issue with the fact that low-cost visitor accommodations are already being pitched as recreational vehicles. Low-cost visitor accommodations can include yurts, cabins, and tent camping as well as recreational vehicles. Please update this section as follows:

~~• Overnight facilities for recreational vehicles are proposed as a potential use in De Anza Cove as part of the De Anza Cove Natural plan, Figure 14a. At this location, recreational vehicle camping would enjoy optimum water access for swimming, birdwatching, observing nature, recreational opportunities and non-motorized watercraft rentals.~~

Overnight low-cost visitor accommodations are proposed as a potential use in De Anza Cove as part of the De Anza Cove Natural plan, Figure 14a. At this location, guests of the low-cost visitor accommodations would enjoy water access for birdwatching, observing nature, recreational opportunities and non-motorized watercraft rentals.

As an aside, elsewhere in this plan, it is indicated that the area near the low-cost visitor accommodations may not be suitable for swimming due to poor water quality. See section 26 where "swimming" is crossed out. Also see recommendation 53: Existing Swimming Areas where it states "Suitability for swimming will be monitored."

Recommendation 26: Relocation of Campland.

The Mission Bay Master Plan and the California Coastal Commission call for low-cost visitor accommodations. This amendment seems to conflate Campland with the low-cost visitor accommodations under Recommendation 25. Please remove references to Campland "relocation" and focus on low-cost visitor accommodations.

There are conflicts in the MBPMP amendment with the Draft PEIR. In the Draft PEIR, a 200-foot buffer along Rose Creek is identified. Yet in the MBPMP amendment, under item 25, it identifies a 100-foot buffer/public use zone. Furthermore, in Figure 8 it identifies a 300-foot public use zone. Again, all references to the buffer along Rose Creek need to be harmonized to avoid confusion in the future. Also, allowable uses within this buffer need to be harmonized as all these references are vague and ambiguous.

The buffer public use zone should preclude hardscape, active recreation, picnic tables and other uses that could potentially cause pollution in Rose Creek or disturbance to birds and other wildlife. The buffer zone should be off-limits to animals, motorized and non-motorized vehicles, and electronic music. This area should be planted with local natives to provide upland habitat adjacent to the lower Rose Creek salt marsh (that is located downstream of Grand Avenue). Please adjust the MBPMP amendment to conform to the Draft PEIR.

O17-16
cont.

In this same section, the bullet point starting with "Active Recreation," there is unclear language. This bullet point seems to be discussing the northeast corner of Mission Bay Park. However, it references "West Mission Bay Drive," which is located on the southern end of Mission Bay Park. It is unclear if the amendment is mixing plans for two separate areas of the park or if this should read "North Mission Bay Drive," which is the access road to the golf course and the San Diego Mission Bay Boat and Ski Club. This paragraph should be clarified.

Also under Item 25: De Anza Natural Development Criteria. The MBPMP amendment states that "De Anza Natural shall not be developed to the detriment of existing and/or future adjacent habitat areas. Foremost in consideration should be the extent to which the area can contribute to the Park's water quality."

However, the Draft PEIR seems to be in conflict with this statement as it is laying out land uses that may preclude development of future adjacent habitat areas due to the lack of modeling done in the Draft PEIR. (See comments from the Friends of Rose Creek on the Draft PEIR.)

I am extremely disappointed to see the emphasis on retaining the De Anza Peninsula. It is subject to extreme erosion without hardened shorelines.

The section called "NATURAL RESOURCE MANAGEMENT PLAN" is wholly inadequate and should reference appropriate sections from the City of San Diego's Parks Master Plan. Specifically, the following sections should be incorporated:

- a. CSR2: Improve the quality of habitat in City parks through best practices that support native threatened and endangered species and habitats and consider climate change impacts on species habitat range/ location.
- b. CSR6: Incorporate best practices in the design of parks and selection of plant materials to reduce environmental impacts and promote native, drought-tolerant, resilient landscapes. Prohibit planting species on the California Invasive Plant Council's list of invasive plants for southern California in parks.
- c. CO5: Manage resource and open space parks for their contributions to ameliorate climate change effects.
- d. CO9: Where feasible, allow access to nature and open spaces, in concert with the goals and policies of the Multiple Species Conservation Program and Subarea Plan guidelines.
- e. AC7: Consider using the Kumeyaay language and culturally appropriate images or symbols when naming and renaming recreation facilities, parks, and open space.
- f. AC8: Consider the Kumeyaay historic use of plants and traditional plant names when developing habitat revegetation and restoration plant palettes and interpretive signage along public trails and pathways.
- g. AC9: Consider the Kumeyaay cultural connection to the land and surrounding environment when developing recreational facilities, parks, and open space.

O17-16
cont.

O17-16
cont.

- h. CSR1: Collaborate with agencies that manage public lands, conservation stakeholders, and community advocates to protect sensitive natural and cultural resources, while providing compatible recreational access and outdoor opportunities.
- i. CSR2: Improve the quality of habitat in City parks through best practices that support native threatened and endangered species and habitats and consider climate change impacts on species habitat range/ location.
- j. CSR7: Increase opportunities for people to interact regularly with green spaces, water, and other natural environments – especially in higher density areas.
- k. CSR16: Increase, expand, and manage the network of habitat patches and wildlife corridors for rare, threatened, and endangered species and the vegetation communities that are projected to be impacted by climate change.
- l. CSR 20: Develop new and upgrade existing parks that support environmental development patterns that protect and preserve natural landforms, public and private open space, wildlife linkages, sensitive species, habitats, canyons, and watersheds.
- m. CSR 21: Preserve San Diego’s rich biodiversity and heritage through the protection and restoration of open space and wetlands resources, including coastal waters, canyons, creeks, riparian wetlands, and vernal pools.
- n. CSR 27: Maximize opportunities to restore native habitat and enhance biodiversity in parks and open space lands.
- o. CSR 30: Promote the awareness and value of wetlands, waterways, and restored landscapes in developed parks as well as open spaces.

In regards to item v. Wildlife habitats, please change the wording in the first bullet point by removing “A large saltwater marsh that enlarges the Northern Wildlife Preserve” to “A large saltwater marsh with 80 acres of salt marsh remaining in the year 2100 that enlarges the Northern Wildlife Preserve.....” in order meet the agreement with the Regional Water Quality Control Board under the SEP.

In regards to item vii: Access and Circulation.:

This item indicates a raised boardwalk or path should be constructed under Ingraham Street to connect Sail Bay with Crown Point. This path was completed 20 years or more ago.

Under Recommendations: **13. Northern Habitat Area:**

Please add kayaking and standup paddle boarding to the list of proposed active recreation opportunities. These are very popular activities in Mission Bay Park.

One popular definition of “active recreation” is as follows:

Active recreation. is defined as **activities engaged in for the purpose of relaxation, health and wellbeing or enjoyment with the primary activity requiring physical exertion, and the primary focus on human activity.**

As Mission Bay Park is primarily an aquatic park. I find it inconceivable that in all the sections discussing "active recreation," non-motorized watercraft activities are not included as types of active recreation proposed for the area. In fact, watercraft activities should be prioritized over non-coastal related active recreation. Furthermore, walking is also "active recreation."

In regards to public park land, please update the MBPMP amendment to indicate that below-market rate long-term storage of recreational vehicles and watercraft is not an appropriate use of public park or tidelands. Our park needs to be actively used and not be a storage facility for aging vehicles as is currently the status quo at Campland-On-the-Bay and the San Diego Mission Bay Boat & Ski club.

The MBPMP amendment fails to delineate between the Northern Wildlife Preserve in Mission Bay Park and the Kendall-Frost Marsh owned and managed by the University of California. All maps and references should clearly delineate the difference.

As we are already into the third decade of the twenty-first century, it is time to start removing names of genocidal Spaniards from our parks. Juan Bautista de Anza was instrumental in Spain's genocidal policies towards indigenous communities. As such, I do not feel that he represents the values the City of San Diego would like to embody in the current era. My recommendation is to create a public re-naming process to allow all San Diegans to participate in re-naming this corner of Mission Bay Park with a focus on nature-based names or names of people who have positively created a City of all people regardless of religion, race, ethnicity or origins.

For the City of San Diego to move forward with tribal relations, references to the historic connections between different bands of indigenous nations and the original 4,000 acres wetlands complex should be indicated in the Executive Summary (ES) of the MBPMP. Furthermore, the ES should state that the City is committed to partnering with local tribes and incorporate language related to tribal relations from the Parks Master Plan into the MBPMP amendment either explicitly or by reference.

The current MBPMP relies on the concept of "Parks within a Park."

And I quote:

"This approach, in effect, creates distinctive recreation areas within the Park, or "Parks Within a Park." One of the main features of the "Parks Within a Park" concept is the **consolidation of natural resources** in the northeast quadrant of the Park, partly in Fiesta Island (mostly upland habitats) and partly in the areas west of the Rose Creek outfall (mostly wetland habitat). Such a land use allocation augments the habitat value of both the existing preserves and proposed new habitats, and maximizes their potential function as a setting for passive, nature-oriented recreation"

I recommend the following changes to the above referenced paragraph:

Change "partly in the areas west of the Rose Creek outfall (mostly wetland habitat)." To "focusing on the areas at the mouth of Rose Creek (mostly wetland habitat)." As the MBPMP

O17-16
cont.

O17-16
cont.

clearly states, the goal is to "create[s] distinctive recreation areas." Wetlands are a distinctive recreation area within the park.

Just as Sea World does not provide low-cost and/or active recreation opportunities, there is no reason why the northeast corner needs to have all uses within the park concentrated in this area. I urge you to focus on ensuring that uses are balanced within the park as a whole and not just within the northeast corner.

My overarching comment is we need to prioritize water quality and wetlands creation at the mouth of Rose Creek. Even with the maximum proposed foot print of habitat restoration as demonstrated by the ReWild "Wildest" alternative, we will still fall short of restoring the entire wetlands complex that existed for millennia.

Deepest regards,



Karin Zirk
lover of wetlands and wildlife

Comment Letter O18: Handa Ornithology Lab, April 20, 2023

O18

From: [Lesley H](#)
To: [B.H. Flaming/COA](#)
Subject: [EXTERNAL] RE: PEIR De Anza Natural
Date: Thursday, April 20, 2023 4:36:42 PM
Attachments: 20230420_DAH_Handa.pdf

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To Whom it May Concern,

O18-1

Please see the attached document regarding comments on the PEIR De Anza Natural Plan. Thank you for your time and consideration.

Respectfully,

Lesley Handa
Handa Ornithology Lab

Sent from my iPhone

O18-1: This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

PlanningCEQA@sandiego.gov
City of San Diego
Planning Department
202 C Street,
San Diego, CA 92101

April 20, 2023

RE: De Anza Natural PEIR

To the City of San Diego,

O18-2 Thank you for the opportunity to comment on the PEIR De Anza Natural Plan. The proposed PEIR ignores the best available science, as the wetlands should be restored to the maximum extent possible to plan for Climate Change. Maximum wetland restoration in Northwest Mission Bay will support the invaluable biodiversity of flora and fauna and ecosystem in the area, provide local coastal resiliency to the surrounding Mission Bay community including protection of urban areas from flooding and storm surges, and increase blue carbon sequestration. As our carbon dioxide levels continue to rise at unsafe levels of 422 PPM (Mauna Loa, NOAA) as of April 9, 2023, the City of San Diego should take advantage of all blue carbon opportunities locally available, such as maximizing the expansion of wetland restoration with this project in northwest Mission Bay.

O18-3 Climate Change poses an existential threat for humanity (United Nations 2018), and the City of San Diego's first priority should be to make decisions to plan for our future in San Diego. The IPCC Synthesis Report AR6 recommends that ecosystem-based adaptation approaches such as urban greening, restoration of wetlands and upstream forest ecosystems have been effective in reducing flood risks and urban heat. Additionally, cognizance of current events in our natural world should provide indication of the dire situation we are in with Climate Change as the effects are accelerating. Numerous events in the natural world exacerbated by Climate Change have already occurred during this year in 2023 and recent past. Events include weather in the State of California receiving historic rainfall with numerous atmospheric rivers and extreme flooding in Northern California, the first three months of 2023 generating a record of 400 tornados in the United States, extreme heat events in Asia this past week that killed 13 people from heat stroke which included an all time temperature record in Thailand and broke records in several provinces in China. Regarding bird conservation, recent findings presented at the annual Pacific Seabird Group Conference in 2023 reported that the mass mortality event of Common Murre *Uria aalge* from the blob, a marine heatwave in the Pacific Ocean was originally underestimated and that 3.2 million birds, or approximately half of the entire population, perished. How many more events need to occur for Climate Change to be elevated as a real threat to the City of San Diego?

O18-4 California has lost more than 90% of its historical wetlands, according to the State and today, many remaining wetlands are threatened. Kendall Frost in Mission Bay presents a unique opportunity to restore a portion of the historic remnant wetland of False Bay and this opportunity should be maximized as Climate Change research and policy guidance directs agencies to adequately prepare for climate change and to conserve wetland areas. Global-scale projections suggest that between 20 and 90 per cent (for low and high sea-level rise scenarios, respectively) of the present-day coastal wetland area will be lost, which will in turn result in the loss of biodiversity and highly valued ecosystem services. (Schuerch et al. 2018). Minimizing the adverse impacts of climate change on wetland ecosystems include the reduction of current

O18-2: This comment expresses support for maximum wetland restoration and biodiversity to plan for climate change. The City of San Diego (City) appreciates the Handa Ornithology Lab's participation in the review of the PEIR for the project. This comment provides an introduction to subsequent comments. It does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O18-3: This comment provides examples of current events that showcase climate change conditions and suggests that the City's first priority should be to make decisions to plan for the future in San Diego, including methods identified in the Intergovernmental Panel on Climate Change's Synthesis Report AR6. PEIR Section 5.5, Greenhouse Gas Emissions, analyzes potential impacts related to greenhouse gas (GHG) emissions that could result from the implementation of the project. Based on the City's Significance Determination Thresholds, a significant impact would occur if implementation of the project would (1) generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or (2) conflict with the City's Climate Action Plan (CAP) or another applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. The City adopted an updated qualified CAP in August 2022 that establishes a Citywide goal of net zero by 2035. A qualified CAP is one that meets requirements so that future development projects requiring environmental review under state law can streamline GHG impact analyses by demonstrating consistency with the CAP. Therefore, this project is evaluated for consistency with the City's CAP based on guidance issued by the City for plan-

level environmental documents to determine the significance of project GHG emissions.

O18-4: This comment states that wetland restoration, including existing wetlands at the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve need to be maximized as much as possible. The project would promote Mission Bay Park Master Plan policies that support the expansion of open space by removing Campland on the Bay (Campland) and replacing it with a natural habitat area contiguous with the existing KFMR/NWP. As suggested in the comment, the project would sustain and enhance the biodiversity of the KFMR/NWP and expand natural habitat areas contiguous to this existing preserve (see Figure 3-1, Site Plan, in PEIR Chapter 3.0, Project Description). The project would follow the Mission Bay Park Master Plan recommendation of replacing the existing Campland area with expanded marshland/habitat area, which would include a combination of mudflats, wetlands, and upland habitats. The total area would be approximately 138.3 acres. The project would maintain the existing University of California, San Diego, Biological Research Field Station facility located at the northwestern corner of the KFMR/NWP, which allows for study and interpretation of the local environment, focusing on the estuarine and bay habitats of Mission Bay. It would also identify a location for a future environmental education and nature interpretation facility.

O18-4 cont. anthropogenic stresses, allowing for inland migration of coastal wetlands as sea-level rises, active management to preserve wetland hydrology, and a wide range of other management and restoration options. (Burkett and Kusler 2000)

O18-5 The City of San Diego falls short with their proposal for wetland restoration in the De Anza Natural Plan as the acreage of wetland restoration should adequately plan for wetland loss anticipated in the future with SLR. Current scientific models such as USGS CoSMoS should be used as a guide to plan for adequate amount of wetlands in the future with anticipated Sea Level Rise. Consequences for inadequate planning for maximum extent of wetlands will be dire and will threaten extirpation of endemic species of concern such as the State and Federally Endangered Light-footed Ridgway's Rail *Rallus obsoletus lewipes* and State Endangered Belding's Savannah Sparrow *Passerculus sandwichensis beldingi* vulnerable to habitat loss in the area with sea level rise, that only inhabit mid and high level marsh as these species will have nowhere to go once these areas are gone. Please consider the science and multiple current events that should elevate the urgency to our situation with Climate Change. Meaningful action is needed to restore the maximum amount of wetland possible with De Anza Natural, as we are running out of time to address Climate Change. Thank you for your time.

O18-6

O18-7

Respectfully,



Lesley Handa
Handa Ornithology Lab

REFERENCES

Burkett, V. and Kusler, J., 2000. Climate change: Potential impacts and interactions in wetlands of the united states I. JAWRA Journal of the American Water Resources Association, 36(2), pp.313-320.

Schuerch, M., Spencer, T., Temmerman, S., Kirwan, M.L., Wolff, C., Linke, D., McOwen, C.J., Pickering, M.D., Reef, R., Vafeidis, A.T. and Hinkel, J., 2018. Future response of global coastal wetlands to sea-level rise. *Nature*, 561(7722), pp.231-234.

O18-5: This comment states that the project's wetland restoration acreage should plan for wetland loss anticipated with sea level rise. A project-specific Sea Level Rise Assessment Technical Report has been prepared and included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise scenario. Therefore, the Final PEIR addresses this comment.

O18-6: The comment states that the state and federally endangered light-footed Ridgway's rail, state endangered Belding's savannah sparrow, and other threatened and endangered native species are vulnerable to habitat loss due to sea level rise. The project would expand habitat areas, resulting in long-term benefits to wetland habitat and species, including those listed in the comment, and the functions and values of the aquatic resources. PEIR Section 5.3, Biological Resources, includes both the Belding's savannah sparrow and light-footed Ridgway's rail in the list of sensitive wildlife species observed or with high potential to occur within the project area. A project-specific Sea Level Rise Assessment Technical Report has also been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project.

O18-7: This comment requests that the City consider science and current events and restore the maximum amount of wetland as possible. See response to comment O18-4. This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

Comment Letter O19: Mission Bay Youth Field Association, April 20, 2023

O19

From: [Mark Sullivan](#)
To: [P.U. Planning/COA](#)
Cc: [Gloria Todd \(External\)](#); [CouncilMember Joe LaCava](#); [Councilmember Jennifer Carrozzelli](#); [ChrisGale@sanedco.gov](#); [Councilmember Stephen Whitburn](#); [billyborrell@gmail.com](#); [Justin Weber](#); [Zaiser Kohler](#); [bothwellm@me.com](#); [general@bobtowncouncil.com](#); [general@bobtowncouncil.org](#); [tom@sdfnews.com](#); [Shah Currie](#); [Munson, Carrie](#); [Sandel, Scott](#); [Sakona Hirst](#); [nmbrteun@gmail.com](#); [Joe & Steeph Smith](#); [Piatanesi, Emily](#); [Julia Sullivan](#)
Subject: [EXTERNAL] Re: DeAnza Cove Amendment to MB Master Plan - Mission Bay Youth Field Association; NOP Comments
Date: Thursday, April 20, 2023 11:55:30 AM
Attachments: [2023-04-20 \(MBYFA Letter\).pdf](#)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Jordan,

O19-1 | Please accept the attached letter from the Mission Bay Youth Field Association as our organization official comments to the De Anza NOP.

O19-2 | **The Mission Bay Youth Field Association requests that provisions within the De Anza Cove Amendment to the Mission Bay Master Plan be revised to “preserve, protect and enhance the current Athletic Area uses”.** Please give serious consideration to reducing the width of the proposed uplands habitat along the east side of the Bob McEvoy Youth Athletic Fields as necessary to protect this valuable youth asset. This small revision will allow the City to avoid a costly and contentious General Development Plan re-arrangement of the entire Athletic Area, which will result in significant impacts to all of the current users.

O19-3 | Thank you for all of your efforts on our behalf. Please feel free to contact me with any questions, or requests for additional information, which you may have.

Mark Sullivan, Principal Engineer
 MJS Construction Mgmt. & Eng. Inc.
 1271 Missouri Street
 San Diego, CA 92109

mjsullivan@mjscm.onmicrosoft.com
 (858) 201-0027 (mobile)

O19-1: This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

O19-2: This comment requests that the project be revised to “preserve, protect and enhance the current Athletic Area uses.” In response to this comment and others, PEIR Figure 3-1, Site Plan, and Table 3-2, Proposed Land Use Acreages, were revised in the Final PEIR to ensure no net loss of active recreation use acreage. In addition, the City will strive to plan for future facilities with design and phased development in a manner that minimizes disruption to active recreation access. Any necessary buffer zones and other land uses proposed for the site of existing recreation facilities would be implemented after these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. The existing uses, including the Bob McEvoy Youth Fields, form the baseline from which the PEIR evaluates the impacts of the project at the program level. Improvements to current facilities may be implemented as future projects come forward. Future projects will be subject to the City’s General Development Plan process to ensure that all requirements are met before they are approved.

Mission Bay Youth Field Association
Office of the Secretary
1271 Missouri Street
San Diego, CA 92109

April 20, 2023

City of San Diego, Planning Department
Attn: Ms. Jordan Moore
9485 Aero Drive, MS 413
San Diego, CA 92123

SUBJECT: DE ANZA COVE AMENDMENT TO THE MISSION BAY MASTER PLAN

Re: Impact, Protection and Preservation of the Bob McEvoy Youth Athletic Fields

Dear Ms. Moore,

The Mission Bay Youth Field Association requests that provisions within the De Anza Cove Amendment to the Mission Bay Master Plan be revised to "preserve, protect and enhance the current Athletic Area uses". Please give serious consideration to reducing the width of the proposed uplands habitat along the east side of the Bob McEvoy Youth Athletic Fields as necessary to protect this valuable youth asset. This small revision will allow the City to avoid a costly and contentious General Development Plan re-arrangement of the entire Athletic Area, which will result in significant impacts to all of the current users.

The Mission Bay Youth Field Association (MBYFA), whose membership includes the Mission Bay Youth Baseball (MBYB) league, the Mission Bay Girls Softball (MBGS) league and the Pacific Youth Soccer League (PYSL) collectively operate, maintain and utilize the Bob McEvoy Youth Athletic Fields (Youth Fields) subject to a Preferential, Non-Exclusive Use and Occupancy Permit with the City of San Diego.

These organizations operate exclusively at the Bob McEvoy Youth Athletic Fields (Youth Fields), maintain them and provide continuous year-round service to between 500 and 600 youth athletes between the ages of 6 and 16. The 8-acre community and regional field complex accommodates athletes across a broad area of our City including the La Jolla, Pacific Beach, Mission Bay, Clairemont, University City, North Park and Central San Diego communities. MBYFA has no other facility from which it operates.

The Youth Fields include three (3) youth baseball fields, one (1) youth softball field, a concession and bathroom facility with supporting features. These fields were constructed by Bob McEvoy with donated funds on land leased to Youth Fields by the City of San Diego for the purpose of supporting youth sports. The field's entry monument notes its dedication on May 11th, 1958 with the words "Constructed For our Youth".

There is one baseball field each for Pinto league players (7-8 years old), Mustang league players (9-10) years old and our Bronco & Pony League (11-14) players. There is one (1) softball field which accommodates girls from the ages of 6 years old through 16 years old. All four (4) out-fields are shared by both boys and girls soccer when baseball and softball is not occurring. In the winter softball and soccer share the softball field and the lights which allows play to occur after sunset.

O19-3: This comment provides contact information and does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O19-4: This comment requests that the Amendment be revised to "preserve, protect and enhance the current Athletic Area uses." Please refer to response to comment O19-2. The PEIR has been revised to ensure no net loss of active recreation use acreages.

O19-5: This comment describes the Mission Bay Youth Field Association and what it encompasses. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

O19-4

O19-5

O19-5
cont.

The larger baseball field and the softball field also host adult and senior leagues regularly. The softball field is one of only two lighted fields in the Pacific Beach / Mission Bay area. This which allows youth play to occur after 5:00 pm in the winter. Adult softball leagues use the lights to play from 7:00 pm to 11:00 pm most weekday nights in the summer and winter.

The proposed De Anza Cove Amendment to the Mission Bay Master Plan (De Anza Project) proposes to eliminate the existing Youth Fields in their entirety. Portions of larger baseball field and the softball field (multi-use fields shared with soccer) will be converted into a combination of Marsh, Wetlands, Coastal Dunes and Trail. The remaining portions of the Youth Fields are identified to be added to a future and currently unprogrammed, 60-acre Active Recreation area.



O19-6

O19-7

City Officials have furnished assurances to the Youth Leagues, the Golf Course and the Tennis Courts that their facilities will not be impacted, however the plan's provisions do not reflect these stated intentions. The current draft proposes new uplands habitat and trail along Rose Creek which will eliminate two (2) of the four (4) ball fields. There are no provisions within the plan that state that the ball fields will be replaced in-kind. Relocating and replacing these ball fields will displace portions of the Golf Course or Tennis Courts.

O19-6: This comments states that the project would eliminate the existing youth fields in their entirety. This comment is incorrect. Please refer to response to comment O19-2.

O19-7: This comments states that the project does not reflect City Officials' previously stated intention to not impact the youth leagues, golf course, and tennis courts. Please refer to response to comment O19-2. The PEIR has been revised to ensure no net loss of active recreation use acreages.

O19-8

The ultimate use of the Active Recreation area is identified to be determined by a future General Development Plan (GDP). The GDP process is an open public forum where the entire area will be "re-imagined". Current Ball Field, Tennis Courts and Golf Course users will compete with other new potential uses to secure a portion of a significantly reduced footprint of available athletic area. The City's "draft" amendment to the Mission Bay indicates intentions for the construction of a ranger station, shared club house and other sports/recreation facilities. There is no room for additional facilities beyond what currently exists without a significant reduction in the scope of the current facilities. Costs associated with rearranging ball fields, golf courses and tennis courts will be in the \$100's of millions of dollars.

O19-8: This comment states that the current ball field, tennis court, and golf course users will have to compete with other new potential uses to secure a portion of available athletic area because there would be no room for additional facilities beyond what currently exists without a significant reduction in the scope of the current facilities. Please refer to response to comment O19-2.

O19-9

De Anza Amendment
enhance suitability of the site, in addition to other passive recreation features.

Active Recreation: Facilities identified as suitable for this area include ball fields, lighted tennis courts, a clubhouse facility (shared among recreation users), restrooms/concessions buildings, a ranger station facility, golf facilities, and other sports/recreation facilities that may be proposed as part of a General Development Plan (GDP). As part of the GDP process, a portion of West Mission Bay Drive may be realigned and a portion may be reduced to maintenance/emergency vehicles, bicycles, and pedestrians only, as depicted on Figures 14a and 14b. Included within the active recreation land use area are water quality improvements and associated multi-modal circulation and parking for the above-referenced uses. As part of an improved pedestrian/bike path along Grand Avenue, existing wetlands and water quality features may be realigned to allow for the pedestrian/bike path to be separated (non-contiguous) from the roadway.

O19-9: This comment provides excerpts from the Amendment and a previous PEIR for the project area. The language shown does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the current PEIR. In addition, the language quoted is not contained in the current PEIR. No aquatic facilities are proposed for this project. Please refer to response to comment O19-2.

PEIR
De Anza Cove Area – North
The northern and eastern portions of the proposed project area, which currently contain active recreational facilities, would continue to allow for these types of active recreational uses, which could include tennis, basketball, softball/baseball, soccer, and/or golf facilities. Specific active recreation uses at this site would be determined during future site planning efforts as part of a General Development Plan through a public process.
The proposed active recreation and aquatics facilities would be in the north section of the De Anza Cove Area, well-buffered from habitat. It is anticipated that the active recreation area would be home to existing uses, and a new potential use could include a City aquatics facility. Aquatics facilities typically include a 25-meter pool, outdoor decks, shade trellises, changing facilities, locker rooms, storage and vehicular areas and possibly a children's pool. Surface parking and access drives would serve both the Regional Parkland and Active Recreation areas. The specific recreation elements would be the subject of a future General Development Plan process.

O19-10

The Mission Bay Youth Field Association requests that provisions within the De Anza Cove Amendment to the Mission Bay Master Plan be revised to "preserve, protect and enhance the current Athletic Area uses". Please give serious consideration to reducing the width of the proposed uplands habitat along the east side of the Bob McEvoy fields as necessary to protect this valuable youth asset. This small revision will allow the City to avoid a costly and contentious General Development Plan re-arrangement of the entire Athletic Area, which will result in significant impacts to all of the current users.

O19-11

MBYFA wants to make it clear to the City that the elimination of these Youth Fields cannot be allowed to happen. **The impacts associated with the destruction of these fields will result in the dissolution of these youth baseball, softball and soccer leagues**. MBYB and MBGS operate exclusively at this facility. PYSL utilizes this facility for approximately 30% to 40% of its activities. **There is no other alternative facility available for our leagues to operate.**

The Bob McEvoy Youth Athletic Fields are unique in their four-field clover leaf configuration, which provides dedicated parking, allows families gather behind the backstops and around the concession building to watch their boys and girls play ball, while their younger siblings play four-square and wall ball after school and on game days. We believe that the City must evaluate alternatives which preserve the existing Youth Fields in their entirety or specify their in-kind replacement directly into the De Anza Project.

Please feel free to contact with any questions or requests for additional information which you may have.

Sincerely,



Billy Bonelli,
Chairman, Mission Bay Youth Athletic Field Association
President, Mission Bay Boys Baseball



Justin Weber
Vice Chairman, Mission Bay Youth Athletic Field Association
President, Pacific Youth Soccer League



Mark Sullivan
Secretary, Mission Bay Youth Athletic Field Association
Board Member, Mission Bay Girls Softball

cc: Todd Gloria, City of San Diego, Mayor
Joe LaCava, City of San Diego, District 1
Jennifer Campbell, City of San Diego, District 2
Stephen Whitburn, City of San Diego, District 3

O19-10: This comment states that the Mission Bay Youth Field Association requests that provisions in the Amendment be revised to "preserve, protect and enhance the current Athletic Area uses." Please refer to response to comment O19-2. The PEIR has been revised to ensure no net loss of active recreation use acreages.

O19-11: This comment reiterates the commenter's opinion that elimination of the youth fields cannot be allowed. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

Chris Cate, City of San Diego, District 6
Marcella Bothwell, PB Town Council, President
Karl Rand, PB Planning Group, President
Tom Melville, Beach & Bay Press, Editor

Comment Letter O20: Renaissance Project, April 20, 2023

O20

From: [Renaissance Project](#)
To: [P.L.N. Planning/CEQA](#)
Subject: [EXTERNAL] DeAnza DEIR Comments
Date: Thursday, April 20, 2023 4:34:18 PM
Attachments: [DeAnza Comment Letter 1.docx](#)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Planning Staff,

Please accept our comment letter for the open comment period for the De Anza natural DEIR.

Please contact us with any further questions.

Thank you,

Brandon Linton & Rebekah Loveless
Co-Directors of **Renaissance Project**

O20-1: This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

O20-1



April 20, 2023

Attn: Heidi Vonblum
 Planning Director
 City of San Diego Planning Department
 9485 Aero Dr, M.S. 413
 San Diego, CA 92123

Dear Planning Committee Staff,

O20-2 Renascence is a local nonprofit that focuses on the reconnection of people and place working primarily in Kumeyaay country we would like to express our support of the maximum wetland restoration. Ideally we would love to see the bay restored to pre contact wetland environment with access to space and resources for generations to come. San Diego has a unique opportunity to create a cooperative project that increases natural habitats, sea level rise resilience, recreational space, and community engagement. We hope the City stands by their project goals, makes the effort to satisfy them and builds a coastal wetland that can be an example of modern development that encourages community engagement for Kumeyaay and all San Diegans. This is a great opportunity for San Diego to lead the way with a project and space that showcases the ability to combine environmental sustainability mixed with usability, while still being a great place for tourism. We would love to see San Diego put its best foot forward.

General Comments:

- O20-3 • We need more acres of restored habitats: With its Wildest plan, ReWild Mission Bay demonstrated how much restoration is possible, and how much acreage is needed for the plan to be a success. But it's clear from the draft EIR that the city is only about three-quarters of the way there in terms of acreage. More acres of restored wetland habitat are imperative.
- O20-4 • We need modeling to show how sea level rise changes the City's proposal: The draft EIR has no scientific modeling on how restored wetlands will offer sea level rise resiliency along the Mission Bay bayfront for public assets like wetland habitat, playgrounds, ballfields and picnic benches.
- O20-5 • Prioritize water quality improvement: Hydrologic modeling results are needed that show how the city's De Anza Natural plan will meet the guidelines set out in the [1994 Mission Bay Park Master Plan Update](#) that first called for restored wetlands in northeast Mission Bay, and the [Regional Water Quality Control Board's](#) SEP funding requirements that water quality improvement be a "foremost" consideration.
- O20-6 • How do the shorelines change and how accessible are they: What long-term maintenance and budget requirements may be needed to keep new shorelines, waterways or recreational areas created as part of the restoration plan intact in the face of rising sea levels, and what will be the impact of that maintenance on the habitat in the long term?
- O20-7 • How does the City deliver accessible marsh for everyone, especially Native Americans: The City's plan includes leased land right in the middle of the restored marsh, a worrying continuation of the existing, privatized land use of this corner of the Bay

O20-2: This comment discusses the Renaissance mission and priorities. Further, this comment states that San Diego has a unique opportunity to create a cooperative project that increases natural habitats, sea level rise resilience, recreational space, and community engagement and hopes the City of San Diego (City) stands by their project goals. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is required.

O20-3: This comment states that more restored habitats are necessary and suggests that the ReWild Mission Bay Wildest Plan demonstrates how much restoration is possible and needed for the plan to be a success. The PEIR addresses the ReWild Mission Bay "Wild," "Wilder," and "Wildest" alternatives in Section 8.2, Alternatives Considered and Eliminated.

The project is an amendment to the Mission Bay Park Master Plan (MBPMP). The MBPMP calls for a "balanced approach" with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project proposes 146.5 acres of active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

The "Wild" and "Wildest" alternatives would not fully consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5) because they lack sufficient site areas for a balance of land uses, including enough site area for recreation and low-cost visitor guest accommodations, and as a result, they would also not provide enough equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access (project objective 1). The "Wilder" and "Wildest" alternatives would also fail to meet project objective 5 because they would reduce the amount of area available for aquatic recreation uses, such as the enjoyment of open beach sand activities and boating.

Therefore, while the ReWild alternatives identify environmental uses, they do not consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5). These alternatives would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2) as the project would, and while these alternatives would provide bike and pedestrian pathways, they would not prioritize public access and connectivity to the extent that the project would or activation of the shoreline (project objective 6). The three ReWild alternatives would not enhance public access or provide equitable access to De Anza Cove because of how those plans laid out the habitat design to reduce access to the cove's shorelines compared to the project. While these alternatives would meet project objectives 3 and 4 by incorporating climate adaptation strategies and embracing responsibility and stewardship of the environment, they would not meet most of the

project objectives. Thus, they have been eliminated from further consideration.

- O20-4:** This comment requests modeling to show how sea level rise changes the City's proposal. A Sea Level Rise Assessment Technical Report has been prepared for the project and Wetlands Optimized Alternative and has been incorporated in the Final PEIR as Appendix N. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise scenario. The Sea Level Rise Assessment Technical Report will inform the future design of the project but does not result in a change in the proposed wetland enhancement acreages or the conclusions of the PEIR.
- O20-5:** This comment states that water quality must be prioritized. The project objectives listed in PEIR Chapter 3.0, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Section 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan.
- O20-6:** This comment asks about the long-term maintenance and budget requirements that may be needed to keep new

shorelines, waterways or recreational areas created as part of the restoration plan intact in the face of rising sea levels. As discussed in PEIR Chapter 3.0, the project is a plan amendment to the MBPMP. No development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. As described in PEIR Section 1.4.1, Type of PEIR, General Development Plans (GDPs) will be developed over time and will provide precise engineering and construction plans for the various elements of the project. Long-term management would be considered during the GDP process. Furthermore, CEQA Guidelines Section 15131 specifically states that “economic or social effects of a project shall not be treated as significant effects on the environment.” CEQA defines “environment” as “the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance” (California Public Resources Code, Section 21060.5). An EIR project analysis is limited to those socioeconomic issues that could result in a direct change to the physical environment. Therefore, the long-term cost of the project is not a consideration of the PEIR. No revisions to the PEIR are warranted.

O20-7: This comment questions how the project would provide an accessible marsh with leased land right in the middle of the marsh. As discussed in PEIR Chapter 3.0, the project would enhance the existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations (recreational vehicles and other low-cost camping facilities), active and passive recreational

opportunities to enhance public use of the area, and improvements to access to recreational uses. The project would place low-cost visitor guest accommodation use on the eastern side of Rose Creek, buffered by upland vegetation. This land use would allocate approximately 48.5 acres for RVs, cabins, or other ecofriendly accommodations and associated open space and facilities consistent with camping accommodations. The project also proposes active and passive recreational amenities to include but not be limited to sand volleyball, pickleball, tennis, walking, cycling, athletic fields, and inline/roller skating and a sandy beach area at the northern and western edges of De Anza Cove. The project would improve access to the park areas along the bay shoreline for residents and visitors. In addition, the project would provide a waterfront multi-use path that would provide users with shore access and would connect the project area to points to the north, west, and east to enhance public equitable access and increase connections to the surrounding communities. The multi-use path would be a feature for users to view the marshes and have distant views of Mission Bay. In addition, areas designated as Regional Parkland would include passive recreation amenities such as overlooks, pathways, and picnic areas. In addition to improved access, the project would include an Interpretive Nature Center, which would foster opportunities for members of local Tribal nations to reconnect to De Anza Cove.



O20-8 | We don't want a watered-down city plan that doesn't get us to the necessary volume of restored wetland acreage needed for a truly successful restoration, and we know our opponents will use whatever tools they can to distract other parties from the main issue.

Kumeyaay Engagement and Accessibility

Since time immemorial Kumeyaay people were living along the coast of Mission Bay. As stewards of the land, they successfully managed the environment and lived within the environment, ensuring the success of all plants, animals and people that lived there. Since the redevelopment of the bay we have seen our wetlands destroyed and the coastal environment suffer. We would like to see maximum wetland restoration for many reasons, but these are the most relevant to the EIR and will help the City achieve their goals:

- Maximum wetland restoration revitalizes the environment for coastline sustainability. We would like to see sea-level rise modeling for all the options; preferred and alternatives
- Maximum wetland restoration would allow for the regeneration of plant and animals that were vital to Kumeyaay sustainability and would then restore the resources that Kumeyaay would be able to engage with.
- Community Engagement and specifically with the Native American communities is sighted in the plan. However the DIER lacks an explanation and a plan on how the City plans on achieving this goal. Please address
 - We would like to see the City engage Kumeyaay and UCSD as potential partners in development of a community engagement plan.
- With the removal of the Kumeyaay from this area, places of gathering and places of traditional practices have been lost. We would like to see in the plan where and how the City plans on Kumeyaay access to the coast and what the City plan on implementing to ensure uninterrupted access for traditional practices, gatherings of people and resources.
- Why was the initial study completed prior to consultation with Kumeyaay people?
- What, if any, steps have been taken to decolonize the area and make all people feel welcome?
- Re-name the cove to a non-spanish name

O20-9

Cultural Resources Evaluation

The DIER address cultural resources as significant and unavoidable. This is mainly addressing the layers below fill. While this is a good point, it is an inadequate conclusion.

- Please evaluate the area of impact to include the near shore, traditional landscapes, as well as the off shore resources.
- Please include a full technical report for the potential impacts to cultural resources. This is a very well known and documented area, the research done for the technical memo is severely lacking content and professional evaluation.
- Within the requested full technical report, we would like to see a true evaluation of the area as a Traditional Cultural Property (TCP)/Traditional Cultural Resource (TCR). The explanation of TCR in the DIER is not up to industry standards. There are multiple

O20-10

O20-8: This comment states that the commenter prefers a plan that provides the necessary volume of restored wetland acreage needed for a truly successful restoration. The City has determined that the project would provide sufficient restored wetland acreage to create a successful restoration project. The project is consistent with the MBPMP, which calls for a “balanced approach” with three components: recreation, commerce, and environment. As discussed in PEIR Chapter 3.0, the project would expand the project area’s natural habitat and improve water quality through the creation of additional wetlands. Specifically, the project includes enhancement and restoration within the existing Kendall-Frost Marsh Reserve/Northern Wildlife Preserve and the expansion of wetlands currently occupied by Campland. The project would follow the MBPMP recommendation of replacing the existing Campland area with expanded marshland/habitat area, which would include a combination of mudflats, wetlands, and upland habitats for a total of 138.3 acres. In addition to environmental components, the project provides elements that would meet the other two components (recreation and commerce). No revisions to the PEIR are warranted.

O20-9: This comment reiterates the desire for maximum wetland restoration and discusses Kumeyaay engagement and accessibility. Please refer to response to comment O20-8 that discusses restored wetlands. The City concurs that wetland restoration would allow for the regeneration of plant and animals in the project area. Please refer to response to comment O20-4 discussing sea level rise. A Sea Level Rise Assessment Technical Report has been prepared for the project and the Wetlands Optimized

Alternative. Regarding Tribal outreach, as discussed in PEIR Section 5.6, Historical, Archaeological, and Tribal Cultural Resources, the City conducted Tribal consultation in accordance with Assembly Bill 52 in 2019 with the Jamul Indian Village and the Lipay Nation of Santa Ysabel. Additional Tribal consultation pursuant to Assembly Bill 52 occurred in 2023. The local Native American Kumeyaay community has expressed a high level of interest with regard to potential impacts to known resources in and around the project site. In addition to other access improvements (see response to comment O20-7), the project would include an Interpretive Nature Center, which would foster opportunities for members of local Tribal nations to reconnect to De Anza Cove.

O20-10: This comment states that the PEIR addresses cultural resources as significant and unavoidable but that it is an inadequate conclusion. The analysis in PEIR Section 5.6 concludes that ground-disturbing activities associated with construction of the project would be located in or near Tribal culturally sensitive areas could include unknown resource discoveries during excavation into native soils, and could result in impacts to prehistoric and historic archaeological resources, sacred sites, human remains, including those interred outside formal cemeteries, and Tribal Cultural Resources (TCR). Impacts were determined to be potentially significant. Subsequent activities implemented in accordance with the project would be required to implement Mitigation Measure MM HIST 5.6-1, which would avoid or minimize impacts. This mitigation measure, combined with the policies of the City's General Plan promoting the identification, protection, and preservation of archaeological resources in addition to

compliance with CEQA and California Public Resources Code, Section 21080.3.1, requiring Tribal consultation early in the development review process, and the City's Historical Resources regulations (City's Municipal Code, Section 143.0212), which require review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resources Sensitivity Maps, would reduce the program-level impacts related to prehistoric or historic archaeological resources. However, even with the application of the existing regulatory framework and mitigation framework that would avoid future project-level impacts, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Therefore, after implementation of feasible mitigation measures, impacts to prehistoric and historic archaeological resources, sacred sites, human remains, and TCRs would remain significant and unavoidable.

As discussed in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. The CEQA Guidelines contain guidance on when a PEIR may be prepared. As explained in the PEIR, CEQA Guidelines Section 15168(a) states that "A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) Geographically, (2) As logical parts in the chain of contemplated actions, (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or (4) As individual activities carried out under the same authorizing statutory or regulatory authority and

having generally similar environmental effects which can be mitigated in similar ways.”

CEQA Guidelines, Section 15146, defines the degree of specificity necessary in an EIR: “The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.” An EIR for a project, such as the adoption of a Master Plan Amendment, should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow. The PEIR does not serve as project-level environmental analysis for any specific development project and adequate information is not available at this time to address potential future site-specific impacts of the proposed project.

Furthermore, the PEIR acknowledges that the City will evaluate future detailed GDPs for future projects as they are developed. A GDP, as defined in City Council Policy 600-33, is a Conceptual Master Plan that identifies the specific activities and amenities to be included within a park. As described in PEIR Section 1.4.1, Type of PEIR, GDPs will be developed over time and will provide precise engineering and construction plans for the recreational elements of the proposed project. Since these plans are currently not available at the planning level, their environmental impacts have been estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements.



archaeological, historical, ethnographic records that need to be considered to make an adequate evaluation

O20-10
cont.

Overall we believe there is much more work to do before an sufficient document is released. There many shortfalls that need to be addressed including

- ✓ the acreage to satisfy the SEP
- ✓ Community engagement plan that includes not just the local residents and tourists, but the marginalized and historically removed
- ✓ Sea-level rise modeling is crucial to the sustainability of the project
- ✓ Does not quantify "low income accommodations" RVs are not for low income families and therefore an RV park will not serve as low income accommodations
- ✓ We are a modern city, yet the ideas in the EIR are antiquated. The EIR separates recreation and natural habitat. We can have both, eco tourism, cultural tourism and sustainable tourism are all tourism and recreation models that are seen across the world, yet the City is still separating the objectives. Please apply a more modern approach to this area.
- ✓ Evaluation for any other plan for land use other than Campland by the Bay. Campland has historically been a poor example of a team player and we would like to see alternative recreation partners or plans evaluated in the new DeAnza plan. At the very least, the lease for the land should be an open bidding process.

O20-11

The "Wildest" was determined to not meet the goals. Please explain how you came to that conclusion. The "Wildest" includes:

- ✓ sufficient acreage,
- ✓ ample community engagement and recreation,
- ✓ sustains the coastal habitat for generations to come,
- ✓ includes ample restoration for traditional practices to be restored,
- ✓ allows for the habitat to self maintain,
- ✓ doesn't need periodic dredging like the other models will
- ✓ brings the quality of the habitat to an unseen level that can be enjoyed by residence and tourists alike
- ✓ Maximize wetland restoration and be an example of a modern project, not an antiquated system of wealthy historical influences continuing to monopolize our shorelines

Co-Directors,

Rebekah Loveless & Brandon Linton

Council Policy 600-33 also outlines the public participation process for the development of future GDPs. A public workshop is required to provide details of the project, including proposed scope, schedule, cost, and related information and would discuss the necessary steps for project review and approval. Once the project design has been completed, prior to approval, the City will route the future project through the Public Project Assessment process, which includes the preparation of the appropriate environmental documentation in accordance with CEQA. At that time, specific mitigation measures will be developed based on the site-specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. At this point, public and agency comments will be invited to address the site-specific impacts identified in the future CEQA documentation. No revisions to the PEIR are warranted.

O20-11: This comment requests an explanation on how the PEIR concludes that the "Wildest" does not meet the project goals. Please refer to response to comment O20-3 that discusses the Rewild alternatives.

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Comment Letter O21: ReWild Coalition, April 20, 2023

O21

From: Andrew Meyer
To: D.M. Hartman@CDOS
Cc: Sarah-Jane Scott; Kathleen Haskel; Jim DeWalt; Brandon Steles; Katrina Gonzalez; Treasa Kormanik
Subject: [EXTERNAL] ReWild Coalition comments on De Anza Natural draft PEIR
Date: Thursday, April 20, 2023 12:34:30 PM
Attachments: ReWild Coalition comment letter for De Anza Natural DEIR final with ESA Technical Memorandum.pdf

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

O21-1

Hello City of San Diego,
Attached are the De Anza Natural draft PEIR comments from the 76 members of the ReWild Coalition, listed out on page 20/21. Also attached to this comment letter is a Technical Memorandum that reviews several components of the draft PEIR and provides useful, science-based input to the City planning process. Several components of the Memo are referenced directly in the comment letter and the entire Memo is combined in the comment letter.

Thank you,
Andrew

--

Andrew Meyer (he/him/his)

Director of Conservation



4010 Morena Blvd., St. 100, San Diego, CA 92117

Office: 858-273-7800, 101

[Website](#) [Facebook](#) [ReWild Mission Bay](#)



Be the hope for birds, wildlife and their habitats. [Become a Friend](#) today!

Please stay connected by signing up for our [eNews mailing list](#) and seeing the latest happenings in our [Newsroom](#).

O21-1: This comment provides an introduction to the comment letter and attached memorandum which is combined in the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.



April 20th, 2023

Attn: Heidi Vonblum
Planning Director
City of San Diego Planning Department
3485 Aero Dr. M.S. 413
San Diego, CA 92123

Subject: Comment on the De Anza Natural Amendment and Draft Programmatic Environmental Impact Report from the ReWild Coalition

Dear Planning Committee Staff,

The ReWild Coalition was established in 2019 to advocate for substantial wetland restoration in the northeast corner of Mission Bay Regional Park that was demonstrated to be feasible in San Diego Audubon's ReWild Mission Bay Feasibility Study. In the subsequent three and half years, the ReWild Coalition has advocated for Wildest-acreage wetland restoration as the best option to satisfy the requirements and recommendations of the Mission Bay Park Master Plan and amendment for De Anza Cove with regard to water quality improvement, sea level rise resilience, carbon sequestration, reconnection opportunities for humans, and retention of and improvements to recreational amenities. We have galvanized over 75 member organizations and thousands of community supporters to help steer the City towards a more sustainable plan for Mission Bay. We have invested in the Park by supporting research into carbon sequestration and the economic costs of sea level rise, connecting with schools and inspiring students, surveying endangered species, and celebrating the marsh through community events.

The changes wrought in Mission Bay over the last 75-100 years are immense, with almost total destruction or conversion of the tidal habitats that existed in the bay and the subsequent loss of the human connection to those places. This land use plan is an historic opportunity to restore this much-diminished habitat and natural infrastructure. The project area supports the 1% of natural habitat that remains in Mission Bay and the tidal wetland habitat that will be restored there through this process are critical, critically valuable and under threat throughout the state because of our history of dredging and developing as well as our future of sea level rise and ongoing impacts of development.

Our comments on the Draft Programmatic Environmental Impact Report for the De Anza Natural Amendment to the Mission Bay Master Plan are organized by draft PEIR section of

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O21-2: This comment discusses the ReWild Coalition mission and priorities. Further this comment states that the restoration of tidal habitat is critical and urges the City of San Diego (City) to analyze the issues brought forward. The City appreciates ReWild Coalitions' participation in the review of the Draft PEIR for the project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft PEIR. Therefore, no further response is warranted.

O21-2



O21-2 cont. analysis, with comments about the Amendment itself in the last section of the document. We urge the City to analyze these issues directly and holistically, and revise the draft Programmatic Environmental Impact Report.

De Anza Natural draft PEIR

Executive Summary

8.1.1 Project Location and Setting

- O21-3
1. The Project Location and Setting must include the ecologically-important Rose Creek and Rose Creek estuary mouth as being in the project area. The historic Rose Creek saltmarsh wetlands stretched from what is today's Kendall-Frost Marsh almost to the I-5 southbound on-ramp on Mission Bay Drive across the northeast corner of Mission Bay and into what are now schools and residential areas. In the 1950s and 1960s, the City of San Diego destroyed these and other wetlands in Mission Bay, converting them to other land uses. Over 4,000 acres of nutrient rich habitat for wildlife, migratory and local birds, fish, and mud creatures that are at the bottom of the food chain were destroyed. For over 30 years, community groups and the City of San Diego have been planning on how to restore, revision, and plan for the area of Mission Bay near the mouth of Rose Creek.

O21-4

 2. Much of the water quality issues in the study area are entwined with Rose Creek, and as water quality improvement is the prime focus of the goals of the Mission Bay Park Master Plan for this area, the known water quality impairment should also be addressed in this section. This area is State Tidelands and should be recognized as such in this section.

O21-5

 3. The draft PEIR includes Kendall-Frost Marsh, but does not identify it as being owned and managed by the University of California, San Diego Natural Reserve System. The draft PEIR also incorrectly includes KFM as part of its habitat restoration work (Appendix D, page 18). Please correct these inaccuracies.

8.1.2 Project Description

- O21-6
1. The Project Description identifies recreational vehicles as a form of low-cost camping (page S-1 and Biological Resources Technical Report, Appendix D, page 17), which is inadequately analyzed when the guidance from the State Coastal Conservancy is that regional comparisons are required to correctly identify low-cost options (Explore the Coast 2019).
 - a. This report states that "the Coastal Conservancy "is not establishing a set rate for units or projects to be considered lower cost," though based on that 2015 report, \$112/night and \$123/night in peak season met the established criteria. No

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O21-3: This comment states that the Project Location and Setting in S.1.1 must include Rose Creek and Rose Creek estuary mouth as being in the project area. The mouth of Rose Creek and a portion roughly 2,400 feet north of the creek mouth fall within the study area. Areas outside of Mission Bay Park are not within the study area. Please refer to Executive Summary section S.1.1, which summarizes the Project Location and Setting, and PEIR Chapter 2.0, Environmental Setting, which provides a description of the project site. Specifically, Section 2.1, Project Location, states that the proposed project area is in the northeastern corner of Mission Bay Park in the City. The subject property is approximately 314 acres of land and approximately 191.2 acres of open water for a total of approximately 505.2 acres. PEIR Figure 2-2, Project Vicinity, identifies the project area and shows that it is bounded to the east by Mission Bay Drive, the north by Grand Avenue (on the eastern portion of the project area) and Pacific Beach Drive (on the western portion), the west by Crown Point Drive, and the south by Mission Bay. In addition, the PEIR states that the Rose Creek inlet bisects the project area into eastern and western portions. Therefore, the project area is clearly defined in the PEIR. No revisions to the PEIR are warranted.

O21-4: This comment states that the known water quality impairment should also be addressed in Section S.1.1. Section S.1.1 is a section in the Executive Summary that summarizes the Project Location and Setting. PEIR Chapter 2.0, Environmental Setting, includes a discussion of existing conditions related to hydrology and water quality (Section 2.3.7, Hydrology and Water Quality). Specifically, the PEIR states that several portions within Mission Bay and its shorelines are listed on the 2020–2022 California Integrated

Report for impairments (Clean Water Act Section 303[d] List/305[b] Report). Portions of the bay listed for impairments are provided in PEIR Table 2-9, Clean Water Act 303(d) List for Regional Board 9 – San Diego Region. The PEIR acknowledges that water quality in Mission Bay is generally lower than that of the coastal ocean water due to poor flushing characteristics of the bay and the input of nutrients and contaminants from stormwater runoff and other sources. In addition, Section 5.7, Hydrology and Water Quality, states that several portions within Mission Bay and its shorelines are listed on the 2020–2022 California Integrated Report for impairments (Clean Water Act, Section 303[d] List/305 [b] Report). Existing water quality conditions in the project area and greater Mission Bay are addressed in the PEIR. No revisions to the PEIR are warranted.

O21-5: This comment states that PEIR does not identify Kendall-Frost Marsh as being owned and managed by the University of California Natural Reserve System. In response to this comment, the following changes have been made to PEIR Chapter 2.0.

The KFMR/NWP is approximately 88 acres consisting mostly of vegetated wetland. It is bordered to the west and north by residential development, to the east by Campland, and to the south by Mission Bay. The University of California, ~~San Diego~~, Natural Reserve System manages the KFMR, and the City manages the contiguous remainder of the marsh as the NWP.

This comment also states that the draft PEIR also incorrectly includes KFM as part of its habitat restoration work in

Appendix D. As discussed in PEIR Chapter 3.0, Project Description, the project includes enhancement and restoration within the existing KFMR/NWP and the expansion of wetlands currently occupied by Campland. As discussed in Table 4, Proposed Project Consistency Determination with Multiple Species Conservation Program Subarea Plan General Management Directives and Area-Specific Management Directives, in Appendix D the project also proposes to conduct enhancement activities within the MHPA, which would treat and remove invasive plant species that have established within the MHPA boundary in the KFMR/NWP which is consistent with the enhancement and restoration activities described in PEIR Chapter 3.0. No changes to Appendix D are warranted.

O21-6: This comment states that the draft PEIR does not provide sufficient information to adequately analyze impacts from a potential lack of low-cost visitor accommodations. It also mentions that the State Coastal Conservancy's Explore the Coast program calls out the need to diversify coastal accommodations away from recreational vehicles. As discussed in PEIR Chapter 3.0, Project Description, the project would replace much of the low-cost visitor guest accommodations currently offered by Campland and the Mission Bay RV Resort by offering 48.5 acres of new low-cost visitor guest accommodations. The low-cost visitor guest accommodations land use allows for a mix of options, including potential RVs, cabins, or other eco-friendly accommodations. No design is currently proposed; therefore, the exact number of campsites to be provided is unknown at this time. Future projects would be subject to the City of San Diego's General Development Plan (GDP) process. A GDP, as defined in City Council Policy 600-33, is a

Conceptual Master Plan that identifies the specific activities and amenities to be included within a park. As described in Section 1.4.1, Type of PEIR, GDPs would be developed over time and would provide precise engineering and construction plans for the recreational elements of the proposed project.

Furthermore, California Environmental Quality Act (CEQA) Guidelines, Section 15131, specifically states that “economic or social effects of a project shall not be treated as significant effects on the environment.” CEQA defines “environment” as “the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance” (California Public Resources Code, Section 21060.5). An EIR project analysis is limited to those socioeconomic issues that could result in a direct change to the physical environment. An EIR is not required to analyze the social or economic effects that would result from any physical changes to a study area as result of a proposed project. As such, the social effect of the project on current access to lower-cost overnight accommodations in Mission Bay and the economic effect of the project on the reduction of the number existing campsites are not considered environmental issues and are not required to be analyzed. The PEIR is not required to include measures designed to mitigate or avoid the loss of affordable campsites and amenities. The PEIR includes measures designed to mitigate or avoid significant environmental impacts as required by CEQA. No revisions to the PEIR are warranted.



reference, report or target demographic has been identified in the draft PEIR. Because existing and/or future facilities might not meet these criteria, impacts from a potential lack of low-cost group camping options are missing from the draft PEIR. Therefore, the draft PEIR does not provide sufficient information to adequately analyze the project effects on low-cost accommodations, which must be provided in the final BEIR.

Q21-6 cont. b. The State Coastal Conservancy's Explore the Coast program specifically calls out the need to diversify our coastal accommodations away from recreational vehicles (Explore the Coast Overnight, an Assessment of Lower Cost Guest Accommodations, 2019) and the draft PEIR should not be specific at this stage of planning on what kind of low-cost guest accommodation will be created. Please provide this clarification.

Q21-7 2. The Project Description states that what we now call Mission Bay is the ancestral lands of the Lipay-Tipay Kumeyaay people, but provides no recognition of their previous stewardship and no specificity about engaging this critical community. Please conduct research and provide this additional information.

§.2 Project Objectives

Q21-8 1. The Project Objectives are written as general project goals rather than project objectives. They are too vague to be used for the purpose of effectively developing the proposed project and evaluating the potential alternatives to the proposed project. The objectives should provide clear, more specific components for each objective. The objectives must also reflect and include relevant requirements and commitments for this portion of Mission Bay Regional Park, such as providing "A large saltwater marsh that enlarges the Northern Wildlife Preserve is proposed west of Rose Creek adjacent to the existing Northern Wildlife Preserve, and along Rose Creek and where the creek merges with Mission Bay." (as specified in the March 2023 Draft De Anza Cove Natural Amendment, page 7). Similarly, the City has committed, pursuant to its RWQCB grant funding (R9-2020-0150 SEP), to create an "expanded wetland alternative [that] would maximize implementable wetland restoration reflective of existing feasibility studies for Mission Bay..." The Project Objectives must be rewritten to provide at least that level of clarity and specificity.

Q21-9 2. The Project Objectives refer to De Anza Cove only, and disregard the other areas of the project identified in the Project Description (§.1.2). These must be revised accordingly.

Q21-10 3. A new Project Objective must be added to "Improve the water quality of the study area and the bay through natural, resilient wetland infrastructure." The draft PEIR is deficient because

O21-7: This comment states that the PEIR provides no recognition of lipay-Tipay Kumeyaay people previous stewardship and provides no specific information about engaging their community. The PEIR does provide this information. PEIR Section 2.3.6, Historical, Archaeological, and Tribal Cultural Resources, provides a discussion of the existing project setting in relation to historical, archaeological, and tribal cultural resources and includes a discussion on the prehistory and ethnohistory of the project site. As stated in the PEIR, the Kumeyaay have roots that extend thousands of years in the County and northern Baja California and are the identified most likely descendants for all Native American human remains found in the City. As discussed in Section 5.6, Historical, Archaeological, and Tribal Cultural Resources, tribal consultation in accordance with AB 52 was conducted in 2019 with Lisa Cumper, Tribal Historic Preservation Officer from the Jamul Indian Village and Clint Linton, Director of Cultural Resources from the lipay Nation of Santa Ysabel. Additional consultation occurred in April 2023. The local Native American Kumeyaay community has expressed a high level of interest with regard to potential impacts to known resources in and around the project site. Therefore, the Draft PEIR includes mitigation measures to reduce impacts related to inadvertent discoveries to a less than significant level. As discussed in PEIR Chapter 3.0, the project would also include an Interpretive Nature Center, which would foster opportunities for members of local Tribal nations to reconnect to De Anza Cove in line with Project Objective 2. No revisions to the PEIR are warranted.

O21-8: This comment states that the project objectives are too vague to be used for the purpose of effectively developing the proposed project and evaluating the potential

alternatives to the proposed project. The project's objectives, which are defined in PEIR Chapter 3.0: Project Description, explain the underlying purpose of the project and are used to develop a reasonable range of alternatives in line with the requirements of CEQA Guidelines Section 15124. No revisions to the PEIR are warranted.

O21-9: This comment states that the Project Objectives refer to De Anza Cove only and disregard the other areas of the project identified in the Project Description. The project objectives, which are defined in PEIR Chapter 3.0: Project Description, apply to the entire project area. As described in PEIR Chapter 3.0, the project area is in the northeastern corner of Mission Bay Park in the City and consists of approximately 314 acres of land and approximately 191.2 acres of open water for a total of approximately 505.2 acres. The project area includes the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP), Campland on the Bay (Campland), Pacific Beach Tennis Club athletic fields, Mission Bay Golf Course and Practice Center, and De Anza Cove area, including a vacated mobile home park and supporting infrastructure, Mission Bay RV Resort, public park, public beach, parking, and water areas. As described in PEIR Chapter 3.0, Project Description, the De Anza Cove area is defined as the area south of North Mission Bay Drive and east of the Rose Creek inlet. The land uses proposed in this area include expanded marshland/habitat, low-cost visitor guest accommodations, regional parkland, open beach, boat facilities and clubhouse, multi-use paths, and upland (dune, sage) and buffer areas. The planning area also encompasses the KFMR/NWP. The project objectives including equitable access (project objective 1), active and passive recreational opportunities (project objective 5) and enhancing public access (project

objective 6), encompass the whole of the project and not just De Anza Cove including the coastal landscape and the surrounding communities, as the comment incorrectly states. No revisions to the PEIR are warranted.

O21-10: This comment states that a new Project Objective must be added to improve the water quality of the study area. The project's objectives, which are defined in PEIR Chapter 3.0: Project Description, explain the underlying purpose of the project and are used to develop a reasonable range of alternatives in line with the requirements of CEQA Guidelines Section 15124. The project objectives include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Chapter 5.7, Hydrology and Water Quality, for a detailed discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.



O21-10 cont.	It ignores impacts to the proposed De Anza Cove from continued impairment on the 303(d) list.
O21-11	a. The Mission Bay Park Master Plan is clear that “[f]oremost in consideration should be the extent to which the Special Study Area can contribute to the Park’s water quality. In fact, additional wetlands creation must be considered as part of the SSA” (MRPMP p53).
O21-12	b. The City of San Diego Notice of Preparation for this draft PEIR also identifies water quality improvement as one of the six listed Project Components.
O21-13	c. In April 2023, the Blue Water Task Force records the Campland sampling location water failing to meet water quality standards 41% of the time for the preceding 12 months. The impact of water quality improvement, and water quality improvement comparison between alternatives is a deficiency of the draft PEIR and must be corrected.
O21-14	d. The USA Technical Memorandum (attached to this comment letter in its entirety) cautions that “the PEIR does not include a discussion of the potential impacts to water quality associated with the creation of a channel that connects Rose Creek to De Anza Cove.”
O21-15	e. The Mission Bay Park Master Plan includes Appendix H-2.1 Hydrology – Use of Created Wetlands for Stormwater Treatment in Mission Bay by San Diego State University researcher Dr. Richard Gersberg. This Appendix, from 29 years ago, emphasizes the importance and understanding of water quality improvement from restored wetlands—with particular emphasis on the improvement of bay-wide water quality from wetlands in the study area. This Appendix must be included in the draft PEIR and used to analyze how the projects help to meet the new Project Objective for water quality improvement, as stated below.
	4. Project Objective 2 is important but the City has not reached out to Kumeyaay and other Indigenous partners to begin this conversation early enough. Writing this PEIR without substantial Tribal input is a colonial point of view on the management of shared natural resources and the City process for partnering with Tribal nations must be improved.
	8.5 Summary of Significant Impacts and Mitigation Measures that Reduce the Impact
	1. Under Biological Resources (Page 8-19), the text states “Would the proposed project interfere substantially with the movement of any native resident or migratory fish or wildlife species...” and found that it would not and proposes no mitigation. Because the preferred project and most alternatives would affect a portion of lower Rose Creek, which supports native species, potentially including native migratory fish as identified by the Regional Water

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O21-11: This comment states that the impact of water quality improvement, and water quality improvement comparison between alternatives is lacking in the Draft PEIR. As stated in CEQA Statute Section 21002.1, “The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.” PEIR Section 5.7 Hydrology and Water Quality analyzes the potential impacts related to hydrology and water quality that could result from the implementation of the project. Refer to response to comment O21-10 for areas in which the PEIR discusses the project’s proposed water quality improvements.

PEIR Chapter 8.0, Alternatives, includes a general description of each of the alternatives, along with a discussion of their ability to reduce the significant environmental impacts associated with the proposed project. In accordance with CEQA Guidelines Section 15126.6(b), the alternatives discussion should focus on those alternatives that, if implemented, could eliminate or reduce any of the significant environmental impacts of a project. The alternatives are evaluated to determine if they would eliminate any significant adverse environmental impacts or reduce those impacts to a below a significant level. Project-related and cumulative impacts are those identified prior to the incorporation or implementation of any mitigation measures. An analysis of potential impacts related to water quality was addressed for each alternative in PEIR Chapter 8.0 in accordance with CEQA. Therefore, no revisions to the PEIR are warranted.

O21-12: This comment states that the PEIR does not include a discussion of the potential impacts to water quality associated with the creation of a channel that connects Rose Creek to De Anza Cove. As stated in PEIR Chapter 3.0 Project Description, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. PEIR Section 5.7, Hydrology and Water Quality, disclosed that the project would have the potential to result in long-term operational pollutants associated with components of the project, such as guest accommodations, parking areas, and street improvements that would introduce potential pollutants, including sediments, heavy metals, nutrients, trash and debris, oxygen-demanding substances, oil and grease, pesticides, and bacteria and viruses. Due to the project's location within and adjacent to Rose Creek and Mission Bay, the immediate pollutants of concern are those that contribute to the eutrophic conditions at the mouth of the Rose Creek inlet (nutrients) and the high coliform counts along the Mission Bay shoreline. In addition, the expansion and regrading required for wetland restoration could lead to increased erosion.

PEIR Table 5.7-1, Recommended Best Management Practices, provides a preliminary list of recommended BMPs and would be refined and implemented as part of final project design and monitoring programs for future project activities consistent with the project in accordance with the City's Stormwater Standards Manual that requires the preparation of a Stormwater Quality Management Plan (SWQMP). In addition, proposed water quality detention basins would be of differing sizes and would capture and

treat stormwater before flowing into Mission Bay. Water quality detention basins would be designed with a sediment forebay, a height-appropriate embankment specific for each area of treatment, and a base to reduce sediment and erosion at the outflow. Native plants would be used to reduce sediment and total suspended solids from stormwater. Additional water quality-enhancing features would include vegetated areas bordering all development to reduce stormwater contamination, including debris and sediment, from reaching Mission Bay. Revegetating the edges of Rose Creek and along the “boot” of De Anza Cove with marsh, wetland, and upland native plants would create another water quality-enhancing feature.

As described in PEIR Section 1.4.1, Type of PEIR, General Development Plans (GDP) will be developed over time and will provide precise engineering and construction plans for the various elements of the project. Since these plans are currently not available at the planning level, their environmental impacts have been estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements. Once the project design has been finalized and prior to approval, the City will route the project through the Public Project Assessment process, including the preparation of the appropriate environmental documentation in accordance with CEQA. At that time, specific mitigation measures will be developed based on the site -specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. The City also acknowledges that, due to lack of detail and site design in the PEIR, many future projects will undergo site-specific CEQA review, which is the

appropriate time to evaluate site-specific impacts. See response to comment O21-6 regarding future project-specific analysis under the City's GDP process. No revisions to the PEIR are warranted.

O21-13: This comment states that the PEIR must include Appendix B-2 from the MBPMP to analyze how the project meets a new water quality project objective suggested by the commenter. PEIR Section 5.7, Hydrology and Water Quality, analyzes potential impacts related to hydrology and water quality that could result from the implementation of the project. The information in this section is based on review of available plans and technical information, including the MBPMP and PEIR, the Hydrology and Water Quality Technical Memorandum prepared by Harris & Associates (Appendix I) for the project, and the City's CEQA Significance Determination Thresholds. In addition, thresholds used to evaluate potential impacts to hydrology are based on applicable criteria in Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) and the City's Significance Determination Thresholds. Please refer to response to comment O21-12 regarding the PEIR's water quality analysis and GDP process. Please refer to response to comments O21-8 and O21-10 regarding the project objectives.

O21-14: This comment states that Project Objective 2 is important and incorrectly states that the City has not reached out to Tribes. As discussed in Section 5.6, Historical, Archaeological, and Tribal Cultural Resources, Tribal consultation in accordance with AB 52 was conducted in 2019 with the Jamul Indian Village and the Lipay Nation of Santa Ysabel. Additional Tribal consultation pursuant to AB

52 occurred in April 2023. The local Native American Kumeyaay community has expressed a high level of interest with regard to potential impacts to known resources in and around the project site. The Draft PEIR includes mitigation measures to reduce impacts related to inadvertent discoveries to a less than significant level. As discussed in PEIR Chapter 3.0, the project would include an Interpretive Nature Center, which would foster opportunities for members of local Tribal nations to reconnect to De Anza Cove. No revisions to the PEIR are warranted.

O21-15: This comment states that significant impacts to native migratory fish could occur because the preferred project and most alternatives would affect a portion of lower Rose Creek. As discussed in PEIR Section 5.3, Biological Resources, the project would provide an overall enhancement of wildlife movement opportunities throughout much of the project area by establishing native wetland habitat in areas that were previously developed, disturbed, or underwater, which would provide additional foraging habitat and cover for wildlife movement. While project construction activities may temporarily disrupt wildlife movement through the project area, the project is not expected to have a significant impact on habitat linkage over the long-term because the overall habitat quality of the existing corridors would increase and improve as a result of project implementation. Furthermore, the PEIR identifies that temporary construction-related and long-term operational indirect impacts to wildlife movement corridors and habitat connectivity could occur as a result of lighting, increased human activity, hydrologic quality (increased turbidity,

excessive sedimentation, flow interruptions, and changes in water temperature), noise, vibration, and trash and garbage, which can attract both introduced terrestrial and native terrestrial and avian predators. The project would comply with the Multiple Species Conservation Program Subarea Plan (MSCP SAP), the San Diego Regional Water Quality Control Board Municipal Permit, the City's Stormwater Standards Manual, and National Pollution Discharge Elimination System (NPDES) regulations, through implementation of site design, source control, and incorporation of construction and permanent best management practices (BMP). Therefore, the PEIR adequately addresses the issue. No revisions to the PEIR are warranted.



O21-15 cont.	Quality Control Board, significant impacts could result, which would necessitate mitigation measures. At a minimum, MM BIC 5.3-2 through MM BIC 5.3-5 should be included.
O21-16	2. The Greenhouse Gas Emission section found no potential impacts because the proposed project would conform to City, regional and state climate plans. However, the proposed project will eventually involve construction and significant earthmoving/dredging/filling that will have at least temporary elevated GHG emissions. How or whether conformance to those plans would result in no significant project impacts (even if construction period-related only) cannot be assured. Absent more project information including a cut/fill analysis beyond what's given in the draft PEIR or appendices, it is not defensible to state that the project may have no significant emissions. This statement of significance should be set aside until a cut and fill analysis and additional specific emission reduction measures are developed when the project-level EIR or General Development Plan analysis is produced. A significant impact must be identified, and, at a minimum, performance standards and mitigation measures described to address this impact. <ul style="list-style-type: none"> a. Information from ESA's Technical Review Memorandum states that the "PEIR provides a cut/fill estimate of 873,886 cubic yards, but it is unclear to what elevations the wetland and upland habitats would be filled. A cut/fill balance analysis should be included to show the project can create wetland habitat and create resident development. Alternatively, potential air quality, greenhouse gas emissions, traffic and other impacts associated with bringing in additional fill to the site should be evaluated in the PEIR."
O21-17	
O21-18	3. Land Use, third row, states that there would be no conflict with the provisions of the MSCIP but also states that impacts would be potentially significant. This contradiction needs to be clarified, with mitigation measures identified if impacts would be significant.
O21-19	4. The draft PEIR does not analyze impacts to the endangered Belding's Savannah Sparrow as the amount of transition zone habitat changes over time. How will the proposed project impact Belding's Savannah Sparrow as sea level rise changes the shoreline?
O21-20	5. The City of San Diego Subarea MSCIP includes the condition for light-footed Ridgway's Rail that "area specific management directives must include active management of wetlands to ensure a healthy tidal saltmarsh environment, and specific measures to protect against detrimental edge effects to this species." Sea level rise will decrease the amount of acceptable core habitat for this species and increase its edge. The De Anza Natural plan needs to identify this as a potential significant impact and propose mitigation measures for it. Please include this analysis.

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O21-16: This comment disagrees with the PEIR conclusion that the project would result in less than significant impacts related greenhouse gas (GHG) emissions since it will involve significant earth moving activities. As discussed in Section 5.4, Greenhouse Gas Emissions, any increases in GHG emissions associated with the construction and operation of the proposed project were included in the City's Climate Action Plan (CAP) GHG emissions inventory and business-as-usual GHG emissions projections prepared for the 2022 CAP. Temporary project construction emissions were included in the CAP GHG emissions inventory and business-as-usual GHG emissions projections and, thus, were accounted for in the CAP. Please also refer to response to comment O21-12 regarding site-specific CEQA review, including GHG impacts, that would be required for specific future projects consistent with the City's GDP process. Therefore, temporary construction-related GHG emissions are adequately analyzed in the Draft PEIR, and no revisions to the PEIR are warranted.

O21-17: This comment states that it is unclear to what elevations the wetland and upland habitats would be filled and a cut/fill balance analysis should be included to show the project can create wetland habitat. In addition, this comment states that potential air quality, greenhouse gas emissions, traffic and other impacts associated with bringing in additional fill to the site should be evaluated in the PEIR. As discussed in PEIR Chapter 3.0, Project Description, the project is a plan amendment to the MBPMP. No development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of future projects are not currently available. Project construction emissions were

estimated in Section 5.2, Air Quality, using the California Emissions Estimator Model (CalEEMod) version 2020.4.0. In order to analyze potential impacts associated with implementation of the project, assumptions were made regarding schedule, construction activities, and implementation of the project because these project details are not known at this time. Such assumptions include approximately 873,886 cubic yards of overall cut and fill balanced over the site. In addition, the modeling assumed construction would begin in 2030 and include typical construction phases: demolition, site preparation, grading, building construction, paving, and architectural coating. Section 5.2 concluded that daily construction emissions for the project would not exceed the City's Significance Thresholds and impacts associated with a violation of air quality standards would be less than significant during construction.

In addition, Section 5.4, Greenhouse Gas Emissions, analyzed the potential impacts related to greenhouse gas (GHG) emissions that could result from the implementation of the proposed project. Impacts related to GHG emissions associated with the proposed project were analyzed through a qualitative analysis of anticipated GHG emissions and consistency with the City's CAP. In general, GHG emissions attributable to the proposed project at full buildout would be less than GHG emissions under the existing conditions and the adopted MBPMP due to the deintensification of land uses and associated decrease in developed land. Any increase in GHG emissions associated with the construction and operation of the proposed project were included in the CAP GHG emissions inventory and business-as-usual GHG emissions

projections prepared for the 2022 CAP. Temporary project construction emissions were included in the CAP GHG emissions inventory and business-as-usual GHG emissions projections and, thus, were accounted for in the CAP. Therefore, compliance with CAP Consistency Regulations upon implementation of the proposed project would result in less than significant impacts associated with GHG emissions.

Please refer to response to comment O21-12 for a discussion regarding future project review under the City's GDP process. The project is adequately analyzed in the Draft PEIR, and no revisions to the PEIR are warranted.

O21-18: This comment states that the PEIR contradicts itself in stating that the project would not conflict with the provisions of the MSCP but also states that impacts would be potentially significant. As discussed in Section 5.1, Land Use, and Section 5.3, Biological Resources, the project is required to document compliance with the MSCP SAP and must comply with the General Planning Policies and Design Guidelines, General Management Directives, Species-specific Area-Specific Management Directives, and MSCP SAP Siting Criteria (City of San Diego 1997). The project would be consistent with the policies and requirements of the MSCP SAP, and no impact would occur. Section 5.3, Biological Resources, also includes an analysis of impacts and provides mitigation for species not covered under the MSCP. The project's compliance with the MSCP would reduce impacts for covered species.

In response to this comment, PEIR Table S-4, Summary of Significant Environmental Impacts has been revised as follows:

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the proposed project conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation and as a result, cause an indirect or secondary environmental impact?	Implementation of the project would not conflict with the environmental goals, objectives, or guidelines of the City's General Plan or other applicable land use plan or regulation, including the MBFMP, Land Development Code, 2021 Regional Plan, CAP, Climate Resilient SD Plan, California Coastal Act, Mission Bay Natural Resources Plan, Pacific Beach Community Plan and Local Coastal Plan, or Balboa Avenue Station Area Specific Plan and, as a result, cause an indirect or secondary environmental impact. Impacts would be less than significant.	Land Use No mitigation measures required.	Less Than Significant
Would the proposed project lead to the development or conversion of General Plan or Community Plan designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community?	Implementation of the project would not lead to the development or conversion of General Plan or Community Plan designated Open Space or Prime Farmland to a more intensive land use, resulting in a physical division of the community. No impact would occur.	No mitigation measures required.	No Impact
Would the proposed project conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan?	Implementation of the project would not conflict with the provisions of the City's MSCP Subarea Plan or other approved local, regional, or state Habitat Conservation Plan. Impacts would be potentially significant. No impact would occur.	No mitigation measures required.	Less Than Significant No Impact
Would the proposed project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?	The project is not located in an airport influence area, and implementation of the project would not result in land uses that are not compatible with an adopted ALUCP. No impact would occur.	No mitigation measures required.	No Impact

O21-19: This comment states that the draft PEIR does not analyze impacts to the endangered Belding's Savannah Sparrow as sea level rise changes the shoreline. A project-specific Sea Level Rise Study has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The project would expand habitat areas, resulting in long-term benefits to wetland habitat; species, including the endangered Belding's Savannah Sparrow; and the functions and values of the aquatic resources. Also, please refer to response to comment O21-12 regarding site-specific review of future projects under the City's GDP process. As part of the GDP process, focused biological surveys would be conducted for future specific projects in accordance with the City's Biology Guidelines. No further revisions to the PEIR are warranted.

O21-20: This comment states the PEIR needs to analyze the loss of acceptable core habitat for the light-footed Ridgway's Rail as a result of sea level rise. A project-specific Sea Level Rise Study has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The project would expand habitat areas, resulting in long-term benefits to wetland habitat; species, including the endangered Ridgway's rail; and the functions and values of the aquatic resources. See response to comment O21-19 regarding the requirement to conduct focused surveys for species during future project site specific review. No further revisions to the PEIR are warranted.



8.7 Environmentally Superior Alternative:

O21-21 1. The PEIR states that the "No Project/No Build Alternative" is the environmentally superior alternative because it "would avoid ground disturbance that could result in impacts to subsurface archaeological resources or Tribal Cultural Resources (TCRs), and would reduce the project's significant and unavoidable impacts on historical, archaeological, and TCRs." However, the draft PEIR also states that this alternative would not meet some project objectives. (As stated above, those project objectives must be more clear, specific, and address environmental, recreational and all other relevant commitments for the project area.) It is not the superior alternative if it would not meet the essential commitments that the City has made and has similar or more impacts than the other alternatives. See further comments in Section 8 below.

Chapter 2: Environmental Setting

O21-22 1. The draft PEIR does not provide a complete description of the environmental setting provided in this section as required for projects of Statewide, Regional or Area-wide Significance. The proposed project is consistent with California Environmental Quality Act (CEQA) Guidelines Section 15206 Projects of Statewide, Regional or Area-wide Significance, because it meets the criteria found in 15206 (b)(1)(C). Because of the project's effects on multiple endangered species and the statewide history of modification of this coastal habitat type, it also meets the criteria found in Section 15206 (b) (2)-the project "[h]as the potential for causing significant effects on the environment extending beyond the city or county in which the project would be located." Therefore, the environmental setting discussion for all environmental topics must include statewide and regional setting information. Although the proposed project might not result in significant biological resources impacts, an analysis of statewide and regional adopted land use plans, as well as state climate change policies require biological resource setting information in order to determine whether the project is in conflict with these plans and policies and the extent that they could result in a significant secondary impact or significant cumulative impact to biological resources and climate change effects goals, for example.

2.3.3.2 Biological Resources

O21-23 1. Table 2-3 incorrectly lists eelgrass beds habitat as wetland habitat. They should be characterized as jurisdictional aquatic resources (Table 2-5) but they are not identified as wetland habitats by any regulatory agency and need to be identified, mitigated, and/or

O21-21: This comment states that the No Project/No Build Alternative shouldn't be identified as the environmentally superior alternative if it would not meet the essential commitments that the City has made and has similar or more impacts than the other alternatives. CEQA Guidelines, Section 15126.6(e)(2), requires the identification of an environmentally superior alternative among the alternatives analyzed in an EIR. PEIR Table 8-6, Summary of Impacts for Alternatives Compared to the Proposed Project, provides a summary comparison of the alternatives with the proposed project to highlight if the alternatives would result in a similar, greater, or lesser impacts. As discussed in PEIR Chapter 8.0 Alternatives, the level of environmental impacts associated with the No Project/No Build Alternative is less than the proposed project, as this alternative would avoid ground disturbance that could result in impacts to subsurface archaeological resources or TCRs and would reduce the project's significant unavoidable impacts on historical, archaeological, and TCRs. Therefore, the No Project/No Build Alternative would be considered the environmentally superior alternative. However, according to Section 15126.6 of the CEQA Guidelines, if the No Project Alternative (No Project/No Build Alternative) is selected as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Therefore, the PEIR concludes that based on a comparison of the alternatives' overall environmental impacts and their compatibility with the project's goals and objectives, the Enhanced Wetlands/Optimized Parkland Alternative is the environmentally superior alternative for this PEIR. The No Project/No Build Alternative is not the environmentally

superior alternative. No revisions to the PEIR are warranted.

O21-22: This comment states that the PEIR environmental setting discussion for all environmental topics must include statewide and regional setting information in accordance with CEQA Section 15206 (b) (4) (C) Projects of Statewide, Regional or Areawide Significance. The project is located in the California Coastal Zone as identified in CEQA Section 15206 (b) (4) (C). Projects meeting this requirement are required to circulate the EIR through the State Clearinghouse for review by relevant state agencies. A Notice of Completion was submitted to the State Clearinghouse for this project prior to the start of public review. In accordance with CEQA Section 15125, an EIR must describe the existing local and regional physical environment as they exist when the notice of preparation of the EIR is published, emphasizing those features that are likely to be affected by the plan and the environmental constraints and resources that are rare or unique to the project area. Baseline environmental conditions for the project area are described in PEIR Chapter 2.0, Environmental Setting. This discussion is adequate to set the baseline conditions from which the project's impacts are assessed. No expansion of this discussion to include additional statewide setting information is necessary to assess the project's impacts on the environment. No revisions to the PEIR are warranted.



restored separately from wetland habitats. Section 113.0105 of the San Diego Municipal Code defines wetlands and eelgrass beds don't meet these criteria:

**Wetlands are defined as areas which are characterized by any of the following conditions:

1. All areas persistently or periodically containing naturally occurring wetland vegetation communities characteristically dominated by hydrophytic vegetation, including but not limited to salt marsh, brackish marsh, freshwater marsh, riparian forest, oak riparian forest, riparian woodlands, riparian scrub, and vernal pools;
2. Areas that have hydric soils or wetland hydrology and lack naturally occurring wetland vegetation communities because human activities have removed the historic wetland vegetation or catastrophic or recurring natural events or processes have acted to preclude the establishment of wetland vegetation as in the case of salt pannes and mudflats;
3. Areas lacking wetland vegetation communities, hydric soils and wetland hydrology due to non-permitted filling of previously existing wetlands;
4. Areas mapped as wetlands on Map No. C-713 as shown in Chapter 13, Article 2, Division 6 (Sensitive Coastal Overlay Zone)."

O21-23
cont.

2. This section must include a description of the state-wide, region-wide, and bay-wide loss of tidal wetland habitats to accurately reflect the importance of these biological resources. The Southern California Wetlands Recovery Project Regional Strategy (2018) shows that 62% of Southern California's tidal wetlands have been lost, and in Mission Bay, the percentage is even higher at over 95% of the historic tidal marsh, mudflats and shallow open water have been converted to deeper open water and upland land uses. Most natural habitats in the bay were destroyed by large-scale dredging by the City of San Diego in the post-World War II years with dredge spoils from this process used to create the islands seen today.

O21-24

3. G. Wildlife Corridors and Habitats: The draft PEIR should discuss the existence of Mission Bay Regional Park along the Pacific Flyway and the establishment of the Park as an Important Bird Area (2014). From the Important Bird Area document: Mission Bay, including the Northern and Southern Wildlife Preserves and the Lamosa Slough, was designated as an Important Bird Area of "Global Significance" by the National Audubon Society because the local area supports >1% of the global population of an endangered species, California Least Tern, nine sensitive species (brant, western snowy plover, light-footed clapper rail, long-billed curlew, California least tern, loggerhead shrike, Clark's marsh wren, Belding's savannah sparrow, large-billed savannah sparrow), and sensitive habitat (salt marsh, eelgrass, alkali flats, and exposed shoreline). Now that light-footed clapper rail has

O21-25

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O21-23: This comment states that the PEIR incorrectly characterizes eelgrass as wetland habitat and that eelgrass needs to be identified, mitigated, and/or restored separately from wetland habitats. The City of San Diego Biology Guidelines identify vegetation communities, land cover types, and wetlands with designations of Tier I through V and wetlands. Eelgrass beds are identified as a type of wetland resource in Table 2-A of the Biology Guidelines. Section 5.3, Biological Resources, identifies potential impacts to eelgrass beds. Implementation of Mitigation Measure MM BIO 5.3-4 Eelgrass Bed Creation would reduce potential direct impacts to eelgrass communities to below a level of significance through adhering to required mitigation ratios for acreage impacts, and creating and restoring impacted vegetation communities. As future site-specific projects come forward, project-level specific analysis would be required during the design and review phase of the project to ensure that any impacts to sensitive habitats are avoided, minimized, or mitigated as conditions of project approval prior to implementation. Therefore, impacts to eelgrass beds are adequately addressed in the PEIR. No revisions are warranted.

O21-24: This comment states that PEIR 2.3.3.2 Biological Resources should include a description of the state-wide, region-wide, and bay-wide loss of tidal wetland habitats to accurately reflect the importance of these biological resources. See response to comment O21-22 that discusses the environmental baseline conditions for the project. The project's impacts are assessed compared to existing baseline conditions in the project area. The previous loss of wetland habitats across the state is not the appropriate

baseline for the project. No revisions to the PEIR are warranted.

O21-25: This comment states that PEIR Section 2.3.3.2, Biological Resources, should identify the Mission Bay Regional Park as being located along the Pacific Flyway and as an Important Bird Area (2014). The City acknowledges that the project is located along the Pacific Flyway. Section 5.3, Biological Resources, and the Biological Resources Technical Report addresses impacts to sensitive avian species and nesting birds. No revisions to the PEIR are warranted.



O21-25 cont.

been broken into two species. Mission Bay Regional Park is an even larger component of our state- and federally-endangered Light-footed Ridgway's Rail's population.

Chapter 4 Regulatory Framework

4.1.3 Local a. City of San Diego General Plan

O21-26

1. The draft PEIR is missing an analysis of the environmental justice history and issues in the study area. The only mention of environmental justice in the draft PEIR is a cursory listing under the Land Use and Community Planning Element, but the draft PEIR needs to analyze the access impact of changing the study area land uses and propose ways to increase and restore access in the setting of the entire Mission Bay Regional Park. Restoring wetlands is an increase in access for underserved communities who have not had access to tidal habitat for education, research, personal wellness and quality of life benefits for decades. Improving access to other recreational components throughout the park should be addressed in this draft PEIR and be a goal of future planning processes.

Chapter 5: Environmental Analysis

5.1 Land Use

O21-27

- 1. This section is incomplete and must include a more thorough and complete analysis of the following.
 - a. State Lands Commission policies and State code related to Mission Bay Park.
 - b. The San Diego Climate Action Plan's acreage goals for restored tidal wetland.
 - i. The 2022 Climate Action Plan values tidal wetland habitats for their quantity of annual sequestration, but the draft PEIR does not recognize or analyze the beneficial and detrimental drawbacks to the proposed tidal wetland acreage in meeting these CAP requirements. This is a critical missing component of the analysis of the comparison between the Wetlands Optimized Alternative and the preferred alternative.
 - ii. As stated in USA 8 Technical Memorandum: "To meet the goals of the CAP, the City should consider maximizing wetland restoration in the project area as salt marsh restoration provides climate benefits. The "Wildest" and Wetlands Optimized alternatives would provide more carbon sequestration benefits compared to the proposed project by providing more wetlands and better meet project objective 3 (mitigate potential sea level rise impacts)."
 - c. Mission Bay Park Natural Resources Management Plan.

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O21-26: This comment states the PEIR is missing an analysis of the environmental justice history and issues in the study area. There are currently no requirements or procedures to evaluate potential environmental justice impacts under CEQA. In addition, this comment states that improving access to other recreational components throughout the park should be addressed in this draft PEIR and be a goal of future planning processes. As discussed in PEIR Chapter 3.0, Project Description, the proposed project is an amendment to the MBPMP to update existing language in the MBPMP and to add new language and recommendations pertaining to the project area to serve local and regional recreation needs while preserving and enhancing the natural resources of the De Anza Cove area. The project would enhance the existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations, active and passive recreational opportunities to enhance public use of the area, and improvements to access to recreational uses. In addition, the basis for the project objectives is to provide equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access, enhance public access and connectivity within De Anza Cove, and increase connections to the surrounding communities, including opportunities for multimodal travel. The proposed project would expand access to other recreational components within the project area. No revisions to the PEIR are warranted.

O21-27: This comment states that Section 5.1, Land Use, is incomplete and must include an analysis of State Lands Commission policies and State code related to Mission Bay

Park, the San Diego Climate Action Plan's acreage goals for restored tidal wetland, Mission Bay Park Natural Resources Management Plan, City of San Diego State Lands Sea Level Rise Vulnerability Assessment, and the City of San Diego Parks Master Plan. PEIR Chapter 4.0, Regulatory Framework, describes the planning framework and additional regulatory documents, plans, and policies relevant to land use for the project. In accordance with the City's CEQA Significance Determination Thresholds, a project should be assessed for consistency with any of the adopted plans and regulations (City of San Diego Municipal Code) which govern the region and the site. Section 5.1.3.1, Issue 1: Conflicts with Applicable Plans, includes a discussion that addresses the project's consistency with applicable land use plans, policies, and regulations as described in PEIR Chapter 4.0 including the MBPMP, City's CAP and Mission Bay Park Natural Resources Master Plan. In addition, Section 5.1, Land Use, addresses the project's consistency with the Climate Resilient SD document, which is the City's comprehensive climate adaptation and resiliency plan. Therefore, the Draft PEIR adequately addresses the governing plans and policies applicable to the project.

As discussed in Section 5.1, Land Use, the project also supports Strategy 5, Resilient Infrastructure and Healthy Ecosystems, identified in the CAP, as it includes the restoration and enhancement of wetlands, which have been identified in the City's Climate Resilient SD Plan as important habitat to mitigate flooding, improve water quality, provide important habitat, absorb wave energy, and minimize coastal erosion. The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350

acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 225.1 acres of wetlands in Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.



O21-27
cont.

- d. City of San Diego State Lands Sea Level Rise Vulnerability Assessment, and
- e. City of San Diego Parks Master Plan.

O21-28

2. California Coastal Act consistency analysis conclusion regarding coastal dependent uses is incorrect and inadequate because the analysis does not fully consider the definition found in Section 30101 which states "[Coastal-dependent development or use] means any development or use which requires a site on, or adjacent to, the sea to be able to function at all." Clearly, the active recreation uses identified in the preferred alternative are not coastal dependent uses. Therefore, because of the substantial acreage this plan designation and proposed uses would result in a significant impact because of its direct conflict with the Coastal Act. The analysis regarding Section 30255 of the Coastal Act provided in the draft PEIR is therefore incorrect and furthermore provides no evidence for the support of its consistency conclusion.

O21-29

This Coastal Act conflict would result in a significant impact that must be addressed in Chapter 8.0 Alternatives. In accordance with Section 15126.6, Consider and Discussion of Alternatives to the Proposed Project, "an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the project objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives."⁵ This means the project alternatives chapter must address all significant impacts, whether or not they are mitigated. The Alternatives Chapter must address alternative locations (Citizens of Golconda Valley v. Board of Supervisors), as well as alternate land uses for the project site to address the active recreational uses identified in the plan that are not coastal dependent and would result in a significant impact. For example, the golf course program could be moved to a nearby course at Tecolote Golf Course or Balboa Golf Course and create many acres of neighborhood recreational amenities and camping accommodations, as well as prioritized wetland restoration. Other options include new tennis courts at the Pacific Beach Taylor Branch Library, shared use of the existing ball fields located on the adjacent Mission Bay High School property, and the creation of a new boat and ski club elsewhere in the Park. These alternatives must be addressed in the Final EIR.

O21-30

- 5.1.3e Climate Action Plan
 - 1. The draft PEIR is incorrectly measuring impacts from climate change as this section does not recognize the positive impact of carbon sequestration of tidal wetland habitats to the City achieving its climate action plan goals through the land use plan.
 - a. The 2022 Climate Action Plan values tidal wetland habitats for their quantity of annual sequestration, but the draft PEIR does not analyze the beneficial and detrimental components of the proposed tidal wetland acreage in meeting these

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O21-28: This comment states that PEIR analysis regarding Section 30255 of the California Coastal Act is incorrect and provides no evidence for the support of its consistency conclusion. Please refer to PEIR Table B-3, Project's Consistency with Applicable Coastal Resources Planning and Management Policies of the California Coastal Act. This table discusses the project's consistency with the California Coastal Act including Section 30255: Priority of Coastal-dependent Developments. The project is not intended to provide only coastal-dependent uses. The current site provides a variety of uses that would be allowed to continue moving forward. The MBPMP calls for a balanced approach with three components: recreation, commerce, and environment. The analysis states that the project is a plan amendment that would include policies to support the creation, restoration, and enhancement of upland and wetland habitat areas. Natural recreation areas are included as a passive recreation buffer to any restored natural resources. As discussed in PEIR Chapter 3.0, Project Description, the project would enhance the existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations, active, and passive recreational opportunities to enhance public use of the area. Regional parkland supports activities such as picnicking, kiteflying, Frisbee games, informal sports, walking, jogging, children's play, bicycling, and skating. The existing regional parkland would be enhanced with recreational amenities and access to the multi-use path that connects the project area to points to the north, west, and east. A sandy beach area at the northern and western edges of De Anza Cove would be adjacent to the low-cost visitor guest accommodation use and the boating use. The beach area would be protected by buffers/safety measures

that would delineate the edges/extents of the non-motorized boat use. The multi-use path would be a feature for users to view the marshes and have distant views of Mission Bay. No revisions to the PEIR are warranted.

O21-29: This comment asserts that the PEIR should identify a significant impact regarding CCC compliance and include project alternatives that reduce the impact. See response to comment O21-28 regarding the project's compliance with the California Coastal Act. Pursuant to CEQA Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR for the project identifies a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. PEIR Chapter 8.0 evaluates four alternatives that were selected for additional analysis; in addition, PEIR Chapter 8.0 identifies the ReWild Mission Bay "Wild," "Wilder," and "Wildest" alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative that were considered but rejected for their failure to meet the project objectives. The rationale for eliminating each alternative is provided in PEIR Chapter 8.0. The Draft PEIR does not identify a significant impact regarding compliance with the California Coastal Act. Therefore, project alternatives do not need to be identified to reduce this impact. No revisions to the Draft PEIR are warranted.

O21-30: This comment states that Section 5.1.3 e. Climate Action Plan does not recognize the positive impact of carbon sequestration of tidal wetland habitats to the City achieving its Climate Action Plan goals through the land use plan. The City agrees that increasing wetlands would

have a positive impact on carbon sequestration of tidal wetland habitat; however, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." PEIR Section 5.1, Land Use, and Section 5.4, Greenhouse Gas Emissions, provides an analysis of the project's consistency with the City's CAP. Project improvements would be consistent with, and aid in implementing, the CAP land use and mobility strategies. No revisions to the PEIR are warranted.



O21-30
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O21-31

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CAP requirements. This is a critical missing component of the analysis of the comparison between the Wetlands Optimized Alternative and the preferred alternative and must be included.

5.3 Biological Resources

- I. The draft PEIR is missing impacts from climate change because no analysis has been done of how sea level rise affects the proposal. The impacts to existing and proposed habitats, as well as the proposed location of low-cost guest accommodation being so close to the shoreline, will be impacted as sea levels rise but no analysis is given.
 - o The City applied for and received funding from the Regional Water Quality Control Board for this land use proposal through R9-2020-0150 SEP, and must comply with the components of that agreement.
 - Specifically, the City agreed that the “expanded wetland alternative would maximize implementable wetland restoration reflective of existing feasibility studies for Mission Bay...” but the draft PEIR does not reflect the restoration acreage that is shown to be feasible in the ReWild Mission Bay Feasibility Study Wildest Alternative.
 - The City also agreed that the land use plan would result in “the establishment of 80 acres of additional functional wetlands (low-mid-high wetland/salt marsh and mudflats), in addition to the Kendall-Frost Marsh/Northern Wildlife Preserve, at the Year 2100 based on current models utilized by the City for sea level rise projections” but without modeling, the DEIR does not show this condition being met.
 - o The City is currently being sued by CLERP and Climate Action Campaign to force an achievable CAP implementation plan and this draft PEIR needs to show how the CAP requirement of 700 acres of tidal wetland restoration is achievable if the City does not adopt a plan with maximized wetlands restoration.
 - o The City’s De Anza Natural website includes an introduction to the project and states: “Sea level rise modeling developed by the United States Geological Survey for Mission Bay and De Anza has been taken into account during the development of De Anza Natural.” That modeling is not included nor analyzed in the draft PEIR.
 - o The San Diego RWQCB adopted ReWild Mission Bay as one of its wetland creation opportunities in 2014, and has multiple beneficial uses that would be reached with maximized wetland restoration in the study area.
 - o State of California AB 691 required vulnerability assessments of State Tidelands and the City of San Diego created the State Lands Sea Level Rise Vulnerability

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O21-31: This comment states that no analysis has been done of how sea level rise affects the project and Wetlands Optimized Alternative. A project-specific Sea Level Rise Study has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise scenario.

O21-32: This comment states that the City must comply with the Regional Water Quality Control Board R9-2020-0150 SEP by including an expanded wetland alternative, but that this alternative does not reflect the restoration acreage shown to be feasible in the ReWild Mission Bay Feasibility Study Wildest Alternative. The PEIR complies with the SEP by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b). The ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives are discussed in Section 8.2, Alternatives Considered and Eliminated.

The MBPMP calls for a “balanced approach” with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active

recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project proposes 146.5 acres of active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

The "Wild" and "Wildest" alternatives would not fully consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5) because they lack sufficient site areas for a balance of land uses, including enough site area for recreation and low-cost visitor guest accommodation, and as a result, they would also not provide enough equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access (project objective 1). The "Wilder" and "Wildest" alternatives would also fail to meet project objective 5 because they would reduce the amount of area available for aquatic recreation uses, such as the enjoyment of open beach sand activities and boating.

Therefore, while all three of these alternatives would identify environmental uses, they would not consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5). These alternatives would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2) as the project would, and while these alternatives would provide bike and pedestrian pathways, they would not prioritize public access and connectivity to the extent that the project would, or activation of the shoreline (project objective 6). The three ReWild alternatives would not enhance public access or provide equitable access to De

Anza Cove because of how those plans laid out the habitat design to reduce access to the cove's shorelines compared to the project. Therefore, while these alternatives would meet project objectives 3 and 4 by incorporating climate adaptation strategies and embracing responsibility and stewardship of the environment, they would not meet most of the project objectives. Thus, they have been eliminated from further consideration.

In addition, the comment states that the project must comply with the requirement that would establish 80 acres of additional functional wetlands. A Sea Level Rise Analysis has been prepared for the proposed project and Wetlands Optimized Alternative and incorporated in the Final PEIR as Appendix N. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise scenario.

O21-33: This comment states that the Draft PEIR needs to show how the CAP requirement of 700 acres of tidal wetland restoration is achievable. The proposed project is not solely required to meet this goal. Other restoration areas within the City's jurisdiction are being considered to meet the goals of the City's CAP. The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 225.1 acres of wetlands in the Mission Bay Park. The project was not

intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

O21-34: This comment states that sea level modeling is not included or analyzed in the Draft PEIR. A project-specific Sea Level Rise Study has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise scenario.

O21-35: This comment states that the ReWild Mission Bay has multiple beneficial uses that would be reached with maximized wetland restoration in the study area. Please refer to response to comment O21-30.

O21-36: This comment states that sea level rise modeling is not provided in the Draft PEIR. Please refer to response to comment O21-31.



O21-36
cont.

O21-37

O21-38

O21-39

Assessment in 2019. This report, showing modeled impacts from sea level rise at .25m increments up to 2.0m already exists, but is not mentioned or used in the draft PEIR. The City does claim on its De Anza Natural website that its sea level rise modeling, and as our letter emphasizes, the City is required to model sea level rise by Regional Board's SEP funding, but sea level rise modeling is not provided in the draft PEIR.

- 3) Information from ISA's Technical Review Memorandum emphasizes this: "...the plan set forth by the City in the PEIR does not include a discussion of a long term resiliency plan that accounts for future projected sea level rise and does not reference the City's Sea Level Rise Vulnerability Assessment" and "[w]ithout a sea level rise assessment, it is not possible to assess the impacts of the project, even at the program level."
- 3) And, with the sea level rise modeling results of the ISA Technical Memorandum, where they estimated the design of the City's proposal, we now can add quantitative results to demonstrate the need for robust modeling. The memo finds that "[i]n 2100, mudflat comprises a majority of the total wetlands area at 124 acres while low, mid, and high marsh combined comprise only 28 acres (Figure 2). Because the current plan is estimated to result in mostly mudflat habitat compared to salt marsh habitat, more of the upland and future marsh area should be set as undeveloped and graded at a very shallow slope. This would allow for the salt marsh habitat (low, mid, and high marsh) to have more room to move upslope as sea levels rise and increase the likelihood of this important habitat remaining through 2100."

5.6 Historical, Archeological, and Tribal Cultural Resources

- 1) The draft PEIR has incorrectly analyzed the impact of the Historical, Archeological, and Tribal Cultural impacts by not conducting a Traditional Cultural Properties review. This analysis should be in this draft PEIR and a Full Phase 1 Technical Report done to the National Park standards should be completed.

Chapter 8: Alternatives

- 1) Draft PEIR Section 8.1.1.2 states that "other plans" are an important component of a project's feasibility; but, as mentioned in the comments on Section 5.1, the 2021 City of San Diego Parks Master Plan is totally missing from the analysis. That plan needs to be included and all the alternatives need to be weighed against the goals of the Parks Master Plan. Several policies of the Parks Master Plan support prioritizing accessible tidal wetland habitat over other land uses, especially:

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O21-37: This comment states that without a sea level rise assessment, it is not possible to assess the impacts of the project, even at the program level. This comment also provides results of an independent sea level rise model. Please refer to response to comment O21-31.

O21-38: This comment states that the PEIR should include a Traditional Cultural Properties review and a full Phase 1 Technical Report to National Park standards. Section 5.6, Historical, Archeological, and Tribal Cultural Resources, states that currently, no designated historical resources are within the project area. However, unevaluated resources may be found to be significant and eligible for designation, including six facilities in the project area, if future project-level site-specific analysis reveals that one or more of these buildings meets the criteria for listing on the National Register of Historic Places, California Register of Historical Resources, or the San Diego Historic Register of Historical Resources. Since these improvements remain conceptual, may be further refined, and may not occur for a number of years, depending on available resources, an in-depth analysis at this programmatic stage may become outdated at the time of implementation of any particular component of the project. However, future development within the project area would be reviewed for conformance with the City's Historical Resources regulations (City's Municipal Code, Chapter 14, Article 3, Division 2). The City's Historical Resources regulations include a number of requirements that would apply to future development evaluated under the proposed project and that would ensure site-specific surveys are completed



O21-39
cont.

- a. CSR2: Improve the quality of habitat in City parks through best practices that support native (threatened and endangered species and habitats and consider climate change impacts on species habitat range/ location.
- b. CSR6: Incorporate best practices in the design of parks and selection of plant materials to reduce environmental impacts and promote native, drought-tolerant, resilient landscapes. Prohibit planting species on the California Invasive Plant Council's list of invasive plants for southern California in parks.
- c. CO5: Manage resource and open space parks for their contributions to ameliorate climate change effects.
- d. CO9: Where feasible, allow access to nature and open spaces, in concert with the goals and policies of the Multiple Species Conservation Program and Subarea Plan guidelines.
- e. AC7: Consider using the Kumeyaay language and culturally appropriate images or symbols when naming and renaming recreation facilities, parks, and open space.
- f. AC8: Consider the Kumeyaay historic use of plants and traditional plant names when developing habitat revegetation and restoration plant palettes and interpretive signage along public trails and pathways.
- g. AC9: Consider the Kumeyaay cultural connection to the land and surrounding environment when developing recreational facilities, parks, and open space.
- h. CSR1: Collaborate with agencies that manage public lands, conservation stakeholders, and community advocates to protect sensitive natural and cultural resources, while providing compatible recreational access and outdoor opportunities.
- i. CSR2: Improve the quality of habitat in City parks through best practices that support native threatened and endangered species and habitats and consider climate change impacts on species habitat range/ location.
- j. CSR7: Increase opportunities for people to interact regularly with green spaces, water, and other natural environments – especially in higher density areas.
- k. CSR16: Increase, expand, and manage the network of habitat patches and wildlife corridors for rare, threatened, and endangered species and the vegetation communities that are projected to be impacted by climate change.
- l. CSR 20: Develop new and upgrade existing parks that support environmental development patterns that protect and preserve natural landforms, public and private open space, wildlife linkages, sensitive species, habitats, canyons, and watersheds.
- m. CSR 21: Preserve San Diego's rich biodiversity and heritage through the protection and restoration of open space and wetlands resources, including coastal waters, canyons, creeks, riparian wetlands, and vernal pools.

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to verify the presence of historical resources. Pursuant to the City's Municipal Code, Section 143.0212(a), the City Manager shall determine the need for a site-specific survey for the purposes of obtaining a construction permit or development permit for development proposed for any parcel containing a structure that is 45 or more years old and not located within any area identified as exempt in the Historical Resources Guidelines of the Land Development Manual or for any parcel identified as sensitive on the Historical Resource Sensitivity Maps. A site-specific survey shall be required when it is determined that a historical resource may exist on the parcel where the development is located and if the development proposes a substantial alteration according to the City's Municipal Code, Section 143.0250(a)(3) (City's Municipal Code, Section 143.0212[c]). If a site-specific survey is required, it shall be conducted consistent with the Historical Resources Guidelines of the Land Development Manual (City's Municipal Code, Section 143.0212[d]). Adherence to the Historical Resources regulations and Guidelines would ensure that appropriate measures are applied to protect historical resources consistent with City requirements. Please refer to response to comment O21-6 regarding the GDP process. No revisions to the PEIR are warranted.

O21-39: This comment states that an analysis against the City of San Diego Parks Master Plan is missing from the Alternatives chapter, and then lists policies of the Parks Master Plan that the commenter believes are applicable. As discussed in Section 5.1, Land Use, the project area is entirely within the boundaries of the MBPMP. The MBPMP



h. CSR 27: Maximize opportunities to restore native habitat and enhance biodiversity in parks and open space lands.

i. CSR 30: Promote the awareness and value of wetlands, waterways, and restored landscapes in developed parks as well as open spaces.

p. PPI4: Providing reduced cost or no cost permits to non-profit organizations for programming and events within parks and recreation centers which benefit disadvantaged communities.

2. Water quality is not a goal of the PEIR commensurate with the goals of the underlying, guiding Master Plan document. As stated under S.2 Project Objectives, a new Project Objective to "Improve the water quality of the study area and the bay through natural, resilient wetland infrastructure" must be added.

3. As stated in preceding comments, the project objectives are insufficient because they are neither sufficiently clear and specific to understand how they are used to develop and evaluate the proposed project and alternatives, nor do they incorporate significant commitments that the City has made regarding wetlands expansion, water quality improvements and even recreational/low-cost accommodations. The project objectives should be revised, include more specificity, and a table prepared to demonstrate how – or not – each alternative conforms to them. As a general statement about the final section of each alternative's assessment (Relationship to Project Objectives), they provide varying if not different kinds of "evidence" (with no specific criteria) to support how the alternative meets or does not meet in full or partially the six objectives. The draft PEIR needs to provide a table that uses consistent, clear, and more specific criteria to summarize how the alternatives are determined to meet or not the objectives – modified as we have recommended in preceding comments.

4. Information from ESA's Technical Review Memorandum highlights the connection between this deficiency and the Project Objectives: "By prioritizing and increasing habitat restoration in the project area, the areas can provide diverse recreational opportunities that are currently not available in the entire Mission Bay Park, including kayaking and birding in or near wetland areas. The PEIR describes the expanded marshland habitat and upland (dune, sage) and buffer areas as places for recreational opportunities in Section 3.3.1.2 but does not count these areas as active recreation. Limiting the definition of active recreation to land-based activities gives the impression that the creation of habitat will reduce recreation in the project area. However, maximizing the restored habitat within the project area would benefit most objective 3 (diversify active and passive recreational uses) by providing significant recreational opportunities, including kayaking and walking paths to observe wildlife, that are coastal-dependent uses not available in Mission Bay Park."

8.2.1.2 Rationale for Elimination

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serves as the Community Plan and Local Coastal Program (CP/LCP) Land Use Plan for Mission Bay Park. The City Parks Master Plan provides goals and policies for the entire City. The MBPMP is the governing document specific for the project area. The PEIR provides analysis of the project's consistency with the MBPMP. No revisions to the PEIR are warranted.

O21-40: The comment states that a new project objective to improve water quality should be added to the PEIR. Please refer to responses to comments O21-4 and O21-10.

O21-41: This comment states that the Draft PEIR objectives are insufficient and need to be revised. Please refer to responses to comments O21-8 and O21-9. In addition, the comment states that the PEIR Alternatives Section needs to provide a table that uses consistent, clear, and more specific criteria to summarize how the alternatives are determined to meet or not the objectives. As discussed in Chapter 8.0, Alternatives, the alternatives addressed in the PEIR were selected based on the extent to which they would feasibly accomplish most or all of the project objectives described in PEIR Chapter 3.0, Project Description. PEIR Chapter 8.0, Alternatives, evaluates four alternatives that would reduce impacts compared to the proposed project (No Project/No Build Alternative, Wetlands Optimized Alternative, Enhanced Wetlands/Optimized Parkland Alternative, and Resiliency Optimized Alternative). The analysis includes a discussion of the proposed alternatives relationship with the project objective. No revisions to the PEIR are warranted.

O21-42: This comment states that limiting the definition of active recreation to land-based activities gives the impression that the creation of habitat will reduce recreation. In addition, this comment states that maximizing restored habitat within the project area would provide significant recreational opportunities. The MBPMP calls for a balanced approach with three components: recreation, commerce, and environment (City of San Diego 2021a). Maximizing restored wetland does provide adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project presents a balanced plan that proposes 225.1 acres of expanded wetland habitat as well as 146.5 acres of the active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that other stakeholders have requested. No revisions to the PEIR are warranted.



O21-43

1. The information provided in this section is unclear and insufficient to determine how a project meets an objective satisfactorily. The Project Objectives do not provide enough specificity to reasonably discriminate among the alternatives. They are inadequate to be used to develop and evaluate a proposed project and alternatives. Nowhere in the PEIR is there a substantive elucidation of what the project objectives should involve and they fail to satisfactorily incorporate the City's existing commitments for both environmental, recreational, and low-cost accommodations within the project area.

2. The draft PEIR has arbitrarily and incorrectly determined that the ReWild Mission Bay Wildest Alternative and the De Anza Natural Wetlands Optimized Alternative do not meet the Project Objectives, and the draft PEIR must be updated to correct this.

a. Project Objective 1: We do not agree with the draft PEIR's conclusions:

"However, the Wetlands Optimized Alternative would not meet project objectives 1 and 6 because, compared to the proposed project, it would not as fully provide equitable access or enhance the public access of De Anza Cove. The Wetlands Optimized Alternative would convert the southern portion of the developed De Anza "bowl" and the De Anza Cove open water areas to wetlands. This would result in a reduction in low-cost visitor guest accommodations and open beach uses." Nor do we agree that Wildest would not provide enough equitable access to the coastal landscape.

- i. The project objectives do not identify any specific set of criteria for "equitable access or enhance public access" or what number of low-cost accommodations and level of beach uses or what level of active and passive recreational uses are desired and appropriate. Absent clarity on those project objectives – and as we reiterate on all project objectives – this is not a justified conclusion with adequate supporting documentation.
- ii. Mission Bay Regional Park has 19 miles of sandy beaches and 9 official swimming areas, but has no accessible tidal marsh habitat. The Wildest and Wetlands Optimized Alternatives are the best alternatives to improve equitable access to recreational opportunities that don't exist at all in the Park.
- iii. The current land uses in the northeast corner of the bay have an unfortunate history of blocking public access to our shared shoreline, and that impact is not addressed in the draft PEIR. A consent decree issued by the Coastal Commission in September of 2021 showed the long history of blocking public access in an over \$1 million agreement between the lessee and the Commission.

O21-44

O21-43: This comment states that the project objectives do not provide enough specificity and are inadequate to develop and evaluate the proposed project and alternatives. Please refer to response to comment O21-8.

O21-44: This comment states that the Draft PEIR incorrectly determined that the ReWild Mission Bay Wildest Alternative and the De Anza Natural Wetlands Optimized Alternative do not meet the project objectives. Please refer to response to comment O21-32 regarding the MBPMP's balanced approach. The "Wild" and "Wildest" alternatives would not fully consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5) because they lack sufficient site areas for a balance of land uses, including enough site area for recreation and low-cost visitor guest accommodation, and as a result, they would also not provide enough equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access (project objective 1). The "Wilder" and "Wildest" alternatives would also fail to meet project objective 5 because they would reduce the amount of area available for aquatic recreation uses, such as the enjoyment of open beach sand activities and boating.

While the ReWild alternatives would identify environmental uses, they would not consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5). These alternatives would not foster opportunities for members of local Tribal nations to



- vi. The draft PEIR states that all the ReWild Alternatives “reduce access to the Cove’s shorelines,” but as stated previously the Project Objectives should not be specific to the Cove as there are numerous other pieces to the study area and the existing sandy shoreline is over-represented in the Park as a whole, and accessible tidal ecosystems are drastically under-represented.
- vii. When the draft PEIR is improved to include consistency review with the Parks Master Plan, multiple policies in that City document support the equitable access improvements that can come from restored habitats, and help bolster the value of access to restored natural places for all San Diegans, including underserved and Indigenous communities.
- viii. ESA’s Technical Memorandum finds that *“by creating more wetlands, both the Wetlands Optimized Alternative and the “Wildest” Alternative provide greater opportunity for all communities to access this unique habitat and enhance public access in Mission Bay.”* Also finding that *“the project should be considered in the context of Mission Bay as a whole. Mission Bay Park has extensive beach areas for public access; therefore creation of more wetlands rather than public beach areas should be considered a benefit, not a negative. The City should consider adjusting the Wetlands Optimized alternative to increase the low-cost visitor guest accommodations and remove all or portions of the golf course, which is not a coastal dependent use while prioritizing wetlands in order to meet project objectives 1 and 6.”*
- b. Project Objective 2: The draft PEIR’s conclusion that Wildest does not meet this Objective is incorrect. Kumeyaay communities cannot reconnect to De Anza Cove, because De Anza Cove was artificially made in the last 75 years. For millennia, local tribal nations engaged with the salt marshes that once existed throughout much of Mission Bay. The salt marsh plants, birds, wildlife, and fish are what constitutes reconnection, not access to a European-American redesign of the natural environment. The ReWild Coalition’s members and discussions with Tribal partners have shown that local Tribal nations want space to reconnect to the tidal habitats for harvesting.
- When the draft PEIR is improved to include consistency review with the Parks Master Plan, multiple policies in that City document support the equitable access improvements that can come from restored habitats, and help bolster the value of access to restored natural places for all San Diegans, including underserved and Indigenous communities.
 - The reason for the Wetland Optimized Alternative satisfying this Objective but not the Wildest alternative is unclear.

O21-44

reconnect to De Anza Cove (project objective 2) as the project would, and while these alternatives would provide bike and pedestrian pathways, they would not prioritize public access and connectivity to the extent that the project would, or activation of the shoreline (project objective 6). The three ReWild alternatives would not enhance public access or provide equitable access to De Anza Cove because of how those plans laid out the habitat design to reduce access to the cove’s shorelines compared to the project. Therefore, while these alternatives would meet project objectives 3 and 4 by incorporating climate adaptation strategies and embracing responsibility and stewardship of the environment, they would not meet most of the project objectives. Thus, they have been eliminated from further consideration.



- iii. The ESA Technical Memorandum shows that “[i]n Section 8.3.2.3, the PEIR states that “The Wetlands Optimized Alternative would meet project objective 2 by fostering opportunities for members of local Tribal nations to reconnect to De Anza Cove.” However, in Section 8.2.1.2, the PEIR states that the ReWild alternatives “would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove,” but with no explanation of how this conclusion was reached. At the program level, there is still an opportunity to work with tribes to adjust any of the project alternatives to provide opportunities for tribal reconnection. At this point, there is no justification for eliminating the ReWild alternatives based on objective 2.”
- c. Project Objective 3: The Wildest and Wetlands Optimized alternatives meets this project objective better than the preferred alternative.
- ReWild Wildest best meets the acreage goal set in Strategy 5 of the City’s Climate Action Plan of 700 acres of restored wetland by 2035. No other alternative restores this much diverse wetland habitat and shows how it persists through sea level rise for the rest of the century.
 - When the draft PEIR is improved to include the acreage goals in the City’s Climate Action Plan, this will be supported by the draft PEIR.
- d. Project Objective 4: The Wildest and Wetlands Optimized alternatives meets this project objective better than the preferred alternative by creating the largest and most contiguous restored wetlands.
- ReWild Wildest meets this goal best because, as described in the review of the Mission Bay Park Natural Resources Management Plan (draft PEIR page 377), the Mission Bay Park Master Plan EIR specifically calls out the benefits of “large contiguous” habitat areas for wetland restoration, and the Wildest plan proposed the largest and most contiguous restored wetland.
 - Of particular concern with the preferred project is the size of the proposed (low-cost accommodations) development on the “boof” area south of the identified new channel. This would reduce the potential to meet the expanded saltmarsh/wetlands commitments and would introduce many impacts (noise, lighting, general human activities) to the adjacent wetlands. The draft PEIR should include an analysis of the potential negative impacts to wetlands adjacent to low-cost accommodations.
- e. Project Objective 5: The draft PEIR claims that ReWild Wildest fail to meet Project Objective 5, but that is incorrect for several reasons. The draft PEIR is deficient because it ignores the recreational and cultural value of an accessible tidal marsh ecosystem, instead only valuing the impact of lost recreation from the

O21-44



O21-44
cont.

existing land uses. There are currently substantial barriers to providing access to functioning tidal ecosystems in the City of San Diego and in Mission Bay Regional Park because those spaces have been modified and taken away from all San Diegans. These alternatives do not reduce the area for aquatic recreation uses, but instead change the kinds of recreational uses.

- a. More tidal wetland acreage results in more active recreation (culturally-informed harvesting, fishing, biking), passive recreation (birding, walking, wheelchairing, kayaking, paddleboarding) and educational opportunities.
- b. These recreational uses are not currently available in Mission Bay Regional Park at all. The addition of these activities to the Bay would greatly balance the recreational opportunities at the Bay-wide scale.
- c. The Coastal Act recognizes the aesthetic value of natural habitats, stating "the scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance."
- d. Restored and accessible tidal wetland habitats in the study area would be one of the most accessible of its type in San Diego, with the new public transit stops at the Balboa Ave. transit station helping people get to this regional asset, specifically helpful for underserved communities.

O21-45

3. Wetlands Optimized Alternative. The draft PEIR states this alternative would be consistent with the SANDAG Regional Plan, enhance access and safety getting to the site and encourage multimodal transportation options, both locally and outside the local area. However, the analysis later identifies that this alternative would have lower or similar GHG emissions while causing higher VMT (because of a reduction in low-cost accommodations and other recreational activities that would then force potential visitors to use other facilities outside the project area). It is unclear how much re-directed travel would occur and, if much of that driving originated outside the local area, whether it would even be significant. Please provide substantial evidence such as the number of users of these facilities by zipcode to support this conclusion, or change the conclusion, if appropriate.

O21-46

4. Neither the Enhanced Wetlands/Optimized Parkland Alternative nor Resiliency Optimized Alternative appear to meet the (current) project objectives. It is unclear how the draft PEIR can conclude that the Environmentally Superior Alternative is the No Project when, as described above, it has many potentially greater impacts than the proposed project and, from our review and assessment, than the Wetlands Optimized Alternative. The draft PEIR does not adequately justify that conclusion.

O21-47

Mission Bay Park Master Plan Amendment comments:

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O21-45: This comment states that it is unclear how much re-directed travel would occur under the Wetland Optimized Alternative which would result in higher VMT and asks to provide the number of users of these facilities by zip code. The PEIR goes above the requirements of CEQA by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b). As discussed in PEIR Chapter 8.0, the Wetlands Optimized Alternative would result in fewer vehicle trips than those generated under the proposed project due to a reduction in traffic-generated uses on site and the total VMT would be reduced compared to the proposed project. Compared to the proposed project, the Wetlands Optimized Alternative would create additional acreage of wetlands and upland habitat while reducing the acreages of the active recreation and low-cost visitor guest accommodations. With the reduction of low-cost visitor guest accommodations, the regional service area of the remaining coastal accessible facilities would expand compared to the proposed project. The service area is the same as that for the proposed project and focuses on publicly accessible coastal low-cost visitor guest accommodation facilities including South Carlsbad State Beach, San Elijo State Beach, Silver Strand State Beach, Mission Bay Campland, and Tijuana Valley Campground. The driving distance for residents within the region would increase under this alternative, from increased distance to other facilities providing low-cost visitor guest accommodations, resulting in an increase in regional VMT compared to the proposed project. Therefore, the PEIR concluded that the Wetlands Optimized Alternative would result in an increase in

regional VMT compared to the proposed project. The number of users by zip code is not required to support this conclusion. No revisions to the PEIR are warranted.

O21-46: This comment states that it is unclear how the Draft PEIR can conclude that the Environmentally Superior Alternative is the No Project Alternative. As discussed in PEIR Chapter 8.0 Alternatives, the No Project/No Build Alternative is not the environmentally superior alternative. The Enhanced Wetlands/Optimized Parkland Alternative is the environmentally superior alternative for the PEIR. See response to comment O21-21.

O21-47: This comment summarizes recommendations about the proposed De Anza Natural Amendment, but does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. No further response is warranted.



O21-47
cont.

1. The Anza Cove should be for non-motorized boats only. Please include an analysis of the impacts on wetlands and water quality from non-motorized and motorized watercraft. This should include an acknowledgement that multi-modal travel goals include non-motorized watercraft.
2. The low-cost visitor accommodation land use on the island needs to showcase resilient recreation opportunities with no permanent structures and no private motorized vehicle access. This will facilitate a resilient park and ecosystem as sea levels rise.
3. The draft PEIR should define low-cost visitor accommodation and include an analysis of how the park will reach their target demographic of low-cost visitors.
4. Education, ecotourism, and stewardship of the Bay should be an integral piece of the accommodation land use.
5. Must keep the buffers to wetland habitat called for in the City's Development Code and buffers should not include walkways or lighting
6. Prioritize native species planting palettes in Regional Parkland
7. #26: we support the removal of guaranteed swimming
8. #53: we support the amendment proposal that water quality in the De Anza Cove swimming area will be monitored to determine suitability for water contact activities.

Conclusion

O21-48

The City's De Anza Natural draft PEIR is a positive step forward from the current land uses and from the 2018 plan, but there is significant progress still to be made. We applaud the City's increased focus on wetland restoration, acknowledgement of the need to empower Komeyaay voices in the planning process, and the work the City is doing on climate resilience and action throughout the City. We see the De Anza Natural plan as an example of the city beginning to prioritize restored habitats and resilient infrastructure, but the ReWild Mission Bay Wildest-level acreage of restored habitats and the prioritization of wetland restoration is the best plan for the City. We submit these comments as improvements to move San Diego forward.

A new Project Objective needs to be added to prioritize water quality improvement in the plan. Sea level rise modeling that shows 80 acres of additional restored tidal wetland habitat is needed at this stage of planning. The City's Climate Action Plan Strategy 5 wetland restoration goals must be used as a benchmark for comparing the alternatives. The draft PEIR must value recreational opportunities from restored, functional habitats and rebalance the recreation at a bay-wide scale where accessible tidal wetlands for active and passive opportunities don't exist. With those improvements, the PEIR will show that the ReWild Wildest plan and the Wetlands Optimized Alternative meet more Project Objectives than the preferred project.

O21-48: This comment is a closing comment and states that the Draft PEIR is a positive step forward but states the ReWild Mission Bay Wildest-level acreage of restored habitats and the prioritization of wetland restoration is the best plan for the City. Please refer to response to comment O21-44 that discusses the ReWild Alternative, O21-8 that discusses the project objectives, O21-31 that discusses sea level rise, and O21-30 that discusses the City's Climate Action Plan Strategy 5.



O21-48
cont.

Thank you for the opportunity to comment, and the member organizations of the ReWild Coalition are excited to get to the next, community-informed stage of planning for the northeast corner of the bay, and then begin restoring our connections to the park.

Sincerely,

The ReWild Mission Bay Coalition Members:

American Academy of Pediatrics: San Diego and Imperial Counties
AFT Guild, Local 1931
American Bird Conservancy
Aqua Adventures
Audubon California
Beautiful P.B.
Bike SD
Buena Vista Audubon Society
California Native Plant Society
Casa Tamarindo
Center for Local Government Accountability
Citizens Coordinate for Century 3
Clean Earth for Kids
Climate Action Campaign
The Climate Reality Project San Diego
Coastal Policy Solutions
Coffee Cycle
Community Congregational Church of Pacific Beach
Corona Enterprises
Earth Discovery Institute
Endangered Habitats League
Environmental Center of San Diego
Environmental Health Coalition
Epsilon Tia
Friends of Escondido Slough
Friends of Mission Bay Marshes
Friends of Rose Canyon
Friends of Rose Creek
Groundwork San Diego
Islamic Center of San Diego
Kai Pono Solutions
Tatino Outdoors

Law Office of Michelle A. Gastil
League of Women Voters of San Diego
McCullough
Mission Bay Fly Fishing Co.
Montgomery-Gibbs Environmental Coalition
Native Like Water
Nature Collective
Ocean Connectors
The Ocean Foundation
Outdoor Outreach
Paradise Gardeners
Pacific Beach Democratic Club
Pacific Beach Rotaract
Renaissance
Rose Creek Watershed Alliance
St. Andrew's by-the-Sea Episcopal Church
San Diego 350
San Diego Audubon Society
San Diego Canyonlands
San Diego City College Audubon Club
San Diego City College SACNAS Chapter
San Diego Coastkeeper
San Diego County Democrats for Environmental Action
San Diego Democrats for Equality
San Diego EarthWorks
Fiesta Island Dog Owners
San Diego Green New Deal Alliance
San Diego Pediatricians for Clean Air
San Dieguito River Valley Conservancy
SD Children and Nature
Save Everyone's Access
Sierra Club San Diego
Southwest Wetlands Interpretive Association

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Stay Cool for Grandkids
 St. Dunstan's Episcopal Church
 Strong Hearted Native Women's Coalition
 Surfrider San Diego
 Sustainability Matters

Unite Here! Local 30
 Urban Corps
 Waste for Life
 The White Sands Green Committee
 Wildcoast



ReWild Mission Bay Wildest Alternative

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memorandum

date: April 18, 2023
to: Andrew Meyer, San Diego Audubon Society
cc:
from: Annie Roberts, Lizzie Schalko PE and Lindsey Sheehan PE, Environmental Science Associates
subject: Technical Review Memorandum for the De Anza Natural Amendment to the Mission Bay Park Master Plan Draft Program Environmental Impact Report, Sch #2018061024

O21-49 This memorandum provides a technical review of and comments on the City of San Diego's Draft Program Environmental Impact Report for the De Anza Natural Amendment to the Mission Bay Park Master Plan (PEIR), including a technical analysis of projected habitat change and resiliency with future sea level rise. In particular, this memorandum discusses why the "Wildest" alternative proposed in the ReWild Mission Bay: Wetlands Restoration Feasibility Study Report (2018) and the Wetlands Optimized alternative are environmentally superior alternatives to the proposed project.

1. Land Use Considerations

O21-50 Both the Wetlands Optimized Alternative and the "Wildest" Alternative better meet the project objectives than the proposed project because they create more wetland habitat and provide equal amounts of active recreation as described further below.

1.1 Project Relation to Entire Mission Bay Park

1.1.1 Wetland Habitat

O21-51 This project offers a unique opportunity to restore wetland habitat in Mission Bay Park, a land use that cannot be created anywhere except along the coast. The Wetlands Optimized Alternative and the "Wildest" Alternative would better meet project objective 4 (restoring and safeguarding natural habitats) because they would provide 297 acres and 315 acres of expanded marshland and buffer habitat, respectively, compared to the 265 acres of expanded marshland and buffer habitat in the Proposed Project.

Since the project would take place in the Coastal Zone, the project is considered a project of statewide, regional, or areawide significance (see the requirements set forth in Section 15206 Projects of Statewide, Regional or Areawide Significance). By specifically focusing on the diversity of land use in the project area and not Mission Bay as a whole, the PEIR does not consider this plan in the larger context. From the Draft Land Use map

O21-49: This comment is an introduction comment to the Technical Review Memorandum for the De Anza Natural Amendment to the Mission Bay Park Master Plan Draft Program Environmental Impact Report prepared by ESA. No further response is warranted.

O21-50: This comment states the Wetlands Optimized Alternative and the "Wildest" Alternative better meet the project objectives than the proposed project because they create more wetland habitat and provide equal amounts of active recreation. This is a summary of the proceeding comments that are addressed below.

O21-51: This comment states that land use decisions should be based on an assessment of acreages of land use types for the entire Mission Bay Park as well as an analysis and assessment of land use by land use type. Please refer to response to comment O21-9 that discusses the project footprint. MBPMP is the overarching planning document for Mission Bay. The project focuses on habitat enhancements within the boundaries of the project area as outlined in PEIR Chapter 2.0 Environmental Setting, in alignment with the goals of the MBPMP. The project proposes to enhance 225.1 acres of wetlands in Mission Bay Park. It is not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats across all of Mission Bay.

O21-51 cont. provided in the 2023 Mission Bay Park Master Plan Amendment (Figure 1), most of the perimeter of Mission Bay is designated as parkland, active recreation, open beach, or play fields, while a minority is designated as wetland habitat. A large portion of the designated wetland habitat that is included is the San Diego River Floodway, which is disconnected from Mission Bay. Also, note that the San Diego River downstream of W. Mission Bay Bridge is designated as wetland habitat, but is actually mostly "open water". Land use decisions should be based on an assessment of acreages of land use types for the entire Mission Bay Park as well as an analysis and assessment of land use by land use type.

1.1.2 Active Recreation

O21-52 The current Land Use map underestimates the availability of space for active recreation that already exists in Mission Bay. The PEIR defines active recreation as activities including "land-based active recreational pursuits, including sand volleyball, over-the-line, walking, bicycling, and in-line/roller skating" (pg 2-4). Figure 2 shows that there are significant areas of Mission Bay that could be considered active recreation and that are not shown on the Land Use map, including playfields, walking/biking paths, and lease area active recreation, including Sea World, Quivira Basin, and Mission Bay Yacht Club. The City of San Diego's website advertises "close to 14 miles of bike paths along Mission Bay."¹ The PEIR also states that "regional parkland supports activities such as picnicking, kiteflying, Frisbee throwing, informal sports, walking, jogging, bicycling, and in-line/roller skating" (pg 2-4). By this definition, all of the regional parkland could be considered active recreation areas. There are also significant portions of Mission Bay that could be considered open water active recreation. The land use map and analysis should include all types of active recreation for the entire park.

O21-52: This comment states that the land use map and analysis should include all types of active recreation for the entire park. Please refer to response to comment O21-9 that summarizes the project boundary. It is not intended to designate recreation across all of Mission Bay.

¹ <https://www.sandiego.gov/park-and-recreation/parks/regional/missionbay/waterland>

O21-52
cont.



**Mission Bay Park
San Diego, California**

1 inch = 1,644 feet
 N 0 800 1,600 3,200 Feet
Land Use

DRAFT: February 2023

- | | |
|--|---------------------------------|
| 1. Park Headquarters & Harbor Transit/Police Station | Lowrise Access |
| 2. RV Parking (Day Use) | Open Space |
| 3. Overflow Parking | Parkland |
| 4. Winter Camping | Play Fields |
| 5. Boat Ramp/Trailer Parking | Wooded Habitat |
| 6. Sand Area | Upland Preserves |
| 7. Northern Wetlands Preserve | Coastal Landscapes |
| 8. Public Amphitheater & Promenade | Shrubland |
| 9. Sand Management | Active Recreation |
| 10. Youth Camping | Low-Cost Visitor Accommodations |
| | Event Facilities/Clubhouse |

Figure 1. Draft Land Use map from the 2023 Mission Bay Park Master Plan Amendment

Q21-52
cont.



Figure 2. Draft Land Use map with additional areas that could be considered Active Recreation

1.2 Wetlands Provide Recreation Opportunities

O21-53

The City has the opportunity to provide a variety of recreation options beyond what is shown as active recreation in the proposed project. In the area planned as "active recreation" on the site plan, the project proposes to use the space for athletic fields and courts and potentially retain the existing golf course. The planned active recreation options, including the existing golf course, are not coastal-dependent uses as defined and required by the Coastal Act. By prioritizing and increasing habitat restoration in the project area, the area can provide diverse recreational opportunities that are currently not available in the entire Mission Bay Park, including kayaking and birding in or near wetland areas. The PEIR describes the expanded marshland/habitat and upland (dune, sage) and buffer areas as places for recreational opportunities in Section 3.3.1.2, but does not count these areas as active recreation. Limiting the definition of active recreation to land-based activities gives the impression that the creation of habitat will reduce recreation in the project area. However, maximizing the restored habitat within the project area would better meet objective 5 (diversify active and passive recreational uses) by providing significant recreational opportunities, including kayaking and walking paths to observe wildlife, that are coastal-dependent uses currently lacking in Mission Bay Park.

2. Sea Level Rise and Climate Change Considerations

AB 691 requires agencies managing State Tidelands, including the City of San Diego, to proactively plan for sea level rise. As a result, the City prepared a State Lands Sea Level Rise Vulnerability Assessment (ICF 2019). Section 3.4 of the PEIR states that the "PEIR programmatically addresses the environmental impacts of future implementation of the project using realistic, worst-case assumptions and establishes a mitigation strategy that would apply to future improvements." However, the plan set forth by the City in the PEIR does not include a discussion of a long-term resiliency plan that accounts for future projected sea level rise and does not reference the City's Sea Level Rise Vulnerability Assessment.

2.1 Sea Level Rise Resiliency

O21-54

The project area is vulnerable to future sea level rise. In the City's Sea Level Rise Vulnerability Assessment (ICF 2019), ICF used U.S. Geologic Services (USGS) data to map sea level rise around Mission Bay, as shown in Figure 3. A zoomed-in version of the USGS data for 6.6 feet of sea level rise with a 100-year storm for the project area is shown in Figure 4 (CoSMoS v3.0; Barnard et al. 2018). It should be noted that these maps do not show extreme Rose Creek discharge, which will have additional flooding impacts.

In both Section 5.7.3.1 and Appendix I, the PEIR mentions: "With implementation of the Proposed Project, De Anza Cove is expected to experience lowered levels of inundation and velocities by 2,100 compared to if the area is left in its current state, as a result of proposed wetland restoration activities, which would increase resilience to sea level rise and coastal flooding." However, the report does not include a sea level rise assessment nor discussion of impacts due to potential adaptation strategies that will be needed to protect developed areas, such as sea walls, revetments, or berms. Without a sea level rise assessment, it is not possible to assess the impacts of the project, even at the program level.

O21-53: This comment states that maximizing the restored habitat within the project area would better meet objective 5 by providing significant recreational opportunities, including kayaking and walking paths to observe wildlife, that are coastal-dependent uses currently lacking in Mission Bay Park. Please refer to response to comment O21-9 that summarizes the project boundaries. As described in PEIR Chapter 3.0, Project Description, the existing regional parkland would be enhanced with recreational amenities and access to the multi-use path that connects the project area to points to the north, west, and east. The upland (dune, sage) and buffer areas would accommodate the proposed multi-use path with educational signage and, in some instances, mounded landforms. The mounded landforms would feature native coastal sage, dune, and other native plants that would be seen and experienced from the waterfront multi-use path. Within this area, recreation amenities such as overlooks, pathways, picnic areas, and interpretive signs could be accommodated and provide opportunities to observe wildlife including birding. Access for non-motorized watercraft including kayaks and canoes would be provided on De Anza Cove at the proposed Boat Facilities/Clubhouse land use and/or in association with the low-cost visitor guest accommodation lease.

O21-54: This comment states that the PEIR does not include a discussion of a long-term resiliency plan that accounts for future projected sea level rise and does not reference the City's Sea Level Rise Vulnerability Assessment. Please refer to response to comment O21-31.

O21-54
cont.



Figure 3. Mission Bay exposure to storm surge and sea level rise.

O21-54
cont.



Figure 4. Projected flood exposure data from the USGS Coastal Storm Modeling System (CoSMoS v3.0; Barnard et al. 2018), accessed via the Our Coast Our Future web platform (Point Blue Conservation Science and USGS 2023).

2.2 SEP Habitat Requirements

According to the Supplemental Environment Project (SEP) required by the RWQCB, the PEIR must fully analyze an expanded restoration alternative that will result in 80 acres of wetland by the year 2100. Without a sea level rise analysis, the PEIR cannot show how the Wetlands Optimized alternative will result in 80 acres of wetland by the year 2100.

O21-55

ESA developed a habitat evolution model for the Wetlands Optimized alternative (Attachment A) assuming all habitat shown in the figure would start as salt marsh. Assuming 3.6 feet of sea level rise by 2100 would result in only 28 acres of salt marsh remaining at the end of the century, with the majority of the site (124 acres) converting to mudflat. To meet the intention of the SEP, the City may consider reducing the amount of development surrounding the habitat and including more upland habitat that would allow the wetland to move upslope within the planning horizon of this plan, similar to the “Wildest” alternative, which would result in 75 acres of wetland by 2100.

2.3 Cut/fill Balance

O21-56

The PEIR notes that the preferred alternative would balance cut and fill onsite, but a basic description or grading plan is not provided. Substantial fill will be needed to create the desired wetland acreage, and additional fill may be needed to raise developed areas to make them resilient to sea level rise. In Section 5.2.3.2, the PEIR states that

O21-55: This comment states that in accordance with the SEP required by the RWQCB, the PEIR must fully analyze an expanded restoration alternative that will result in 80 acres of wetland by the year 2100. Please refer to response to comment O21-31. To satisfy the requirements of the SEP, a Sea Level Rise Assessment Technical Report (Appendix N) for both the proposed project and the Wetlands Optimized Alternative was prepared to demonstrate how 80 acres of additional functional wetlands (low-high salt marsh and mudflat habitat) could persist at year 2100. The Sea Level Rise Assessment Technical Report will inform the future design of the project.

O21-56: This comment states that a cut/fill balance analysis should be included to show the project can create wetland habitat and create resilient development and potential air quality, greenhouse gas emissions, traffic and other impacts associated with bringing in additional fill to the site should be evaluated in the PEIR. Please refer to response to comment O21-17.

O21-56 cont. "future grading and excavation quantities are currently unknown." The PEIR provides a cut/fill estimate of 873,886 cubic yards, but it is unclear to what elevations the wetland and upland habitats would be filled. A cut/fill balance analysis should be included to show the project can create wetland habitat and create resilient development. Alternatively, potential air quality, greenhouse gas emissions, traffic and other impacts associated with bringing in additional fill to the site should be evaluated in the PEIR.

2.4 Greenhouse Gases and Carbon Sequestration

The City of San Diego seeks to achieve a goal of net zero GHG emissions by 2035 (City of San Diego 2022). The City's Climate Action Plan (CAP, 2022) identifies a restoration target of 350 acres of salt marsh land by 2030 to provide resiliency, air quality, and public health benefits, and 700 acres by 2035.

O21-57 National and international organizations, as well as state and federal agencies, have become increasingly interested in exploring the carbon storage and sequestration capacities of wetlands, especially salt marshes, mangroves, and seagrass beds (see for example Smardon 2019). Peer-reviewed scientific literature has demonstrated the great significance of these ecosystems for both carbon sequestration and storage (Pendleton et al. 2012; Fourqurean et al. 2012). To meet the goals of the CAP, the City should consider maximizing wetland restoration in the project area as salt marsh restoration provides climate benefits. The "Wildest" and Wetlands Optimized alternatives would provide more carbon sequestration benefits compared to the proposed project by providing more wetlands and better meet project objective 3 (mitigate potential sea level rise impacts).

3. Public Access

In Section 8.3.2.3, the PEIR says "the Wetlands Optimized Alternative would not meet project objectives 1 and 6 because, compared to the proposed project, it would not as fully provide equitable access or enhance the public access of De Anza Cove." Currently, the only public access to wetlands in Mission Bay is during Love Your Wetlands Day at Kendall Frost Marsh, which occurs once a year, and during the UC San Diego Natural Reserve System and San Diego Audubon's Wander the Wetlands program, for two hours twice a month. A fence around the site keeps the public out during the rest of the year. While public access to wetlands certainly should be balanced with protection of the habitat, wetlands are a unique coastal landscape that are currently restricted in Mission Bay for almost all San Diegans. Public access to wetlands can include walkways by the shoreline of the wetland, blinds to enhance opportunities to observe wildlife, some boardwalks through the wetlands and a kayak trail for access at higher tides, as described in the "Wildest" Alternative design in the ReWild Mission Bay Restoration Feasibility Study Report (2018). By creating more wetlands, both the Wetlands Optimized Alternative and the "Wildest" Alternative provide greater opportunity for all communities to access this unique habitat and enhance public access in Mission Bay.

O21-58 Additionally, Section 8.3.2.3 notes that increasing wetlands "would result in a reduction in low-cost visitor guest accommodations and open beach uses." As discussed under the Land Use Considerations section, the project should be considered in the context of Mission Bay as a whole. Mission Bay Park has extensive beach areas for public access; therefore creation of more wetlands rather than public beach areas should be considered a benefit, not a negative. The City should consider adjusting the Wetlands Optimized alternative to increase the low-cost visitor guest accommodations and remove all or portions of the golf course, which is not a coastal dependent use while prioritizing wetlands in order to meet project objectives 1 and 6. Similarly, while the ReWild options do not

O21-57: This comment states that to meet the goals of the CAP, the City should consider maximizing wetland restoration in the project area as salt marsh restoration provides climate benefits. Other restoration areas within the City's jurisdiction are being considered to meet the goals of the City's Climate Action Plan (CAP). The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 225.1 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

O21-58: This comment states that both the Wetlands Optimized Alternative and the "Wildest" Alternative provide greater opportunity for all communities to access this unique habitat and enhance public access in Mission Bay. Please refer to response to comment O21-32 and O21-46. The comment further states that the project should be considered in the context of Mission Bay and therefore creation of more wetlands rather than public beach areas should be considered a benefit, not a negative. Please refer to response to comment O21-49 and O21-51.

O21-58 cont. include details on the development that could occur in the project area, the "Wildest" alternative provided sufficient space to create a comparable area of low-cost visitor guest accommodations.

4. Impacts to Water Quality

The Mission Bay Master Plan Amendment (2023) states that an important consideration of the project area "should be the extent to which the area can contribute to the Park's water quality." Due to the high importance of water quality to the project, the project should include an additional objective to enhance water quality and water circulation within De Anza Cove.

O21-59 The PEIR explains that pollutants generated through construction activities will be addressed through a SWPPP and the implementation of construction best management practices (BMPs). Potential long-term pollutants would be addressed through project area and source control BMPs. A SWQMP would be prepared to ensure that runoff is adequately captured and/or treated. However, the PEIR does not include a discussion of the potential impacts to water quality associated with the creation of a channel that connects Rose Creek to De Anza Cove. A water circulation study will be an important next step to size the channel and determine whether the channel will make the water quality in De Anza Cove measurably worse.

5. Impacts to Eelgrass

A significant amount of new wetland habitat shown on the site plan requires the fill of open water in existing eelgrass beds. The PEIR describes the placement of fill to raise elevations for marsh habitat as the creation of new wetland habitat. A more accurate description would be the conversion of habitat from eelgrass to wetland. The PEIR addresses the removal of eelgrass habitat and describes the San Diego Biological Guidelines (SDBG) required mitigation ratio of 2:1, where 1:1 mitigation must occur within Mission Bay. However, the PEIR does not include a description of where and how eelgrass habitat will be mitigated nor an assessment of the potential impacts of such mitigation.

O21-60

6. Tribal Nation Reconnection Opportunities

The PEIR does not describe how any alternative would or would not meet objective 2 (foster opportunities for members of local Tribal nations to reconnect). In Section 8.3.2.3, the PEIR states that "The Wetlands Optimized Alternative would meet project objective 2 by fostering opportunities for members of local Tribal nations to reconnect to De Anza Cove." However, in Section 8.2.1.2, the PEIR states that the ReWild alternatives "would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove," but with no explanation of how this conclusion was reached. At the program level, there is still an opportunity to work with tribes to adjust any of the project alternatives to provide opportunities for tribal reconnection. At this point, there is no justification for eliminating the ReWild alternatives based on objective 2.

O21-61

7. Conclusions

The PEIR should include specific criteria for determining whether an alternative meets a project objective or not. For example, in the PEIR, there is no basis specified for determining whether a project alternative meets or does not meet the project objectives related to land use (objectives 4 and 5) and which project objective takes priority. The PEIR states "the Wetlands Optimized Alternative would not fully implement project objective 5, as active and passive recreational uses would be further reduced" (pg. 8-43). Following this logic, the preferred alternative

O21-62

O21-59: This comment states that the project should include an additional objective to enhance water quality and water circulation within De Anza Cove. Please refer to response to comment O21-12.

This comment further states a water circulation study will be an important next step to size the channel and determine whether the channel will make the water quality in De Anza Cove measurably worse. As stated in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. The design of the future proposed channel is not currently available; therefore, preparation of a water circulation study would be premature. No revisions to the PEIR are warranted.

O21-60: This comment states that the PEIR does not include a description of where and how eelgrass habitat will be mitigated nor an assessment of the potential impacts of such mitigation. See response to comment O21-23. PEIR Section 5.3, Biological Resources, includes mitigation measure MM BIO 5.3-4 Eelgrass Beds Creation which provides a description of how eelgrass habitat would be mitigated. MM BIO 5.3-4 has been revised as follows:

MM BIO 5.3-4 Eelgrass Beds Creation. Potential direct impacts to eelgrass beds caused by placement of fill material within Mission Bay shall be mitigated in accordance with the requirements of the resource agencies and the City of San Diego. The City of San Diego shall require a mitigation ratio of 2:1 in accordance with the City of San Diego's Municipal

O21-62
cont.

would not meet project objective 4 because restoration of habitats would be reduced compared to the Wetland Optimized Alternative and the “Wildest” Alternative. As discussed above, given the larger context of Mission Bay Park, achieving project objective 4 should take precedence over achieving project objective 5.

Table 1 provides a summary of the Proposed Project, Wetlands Optimized Alternative, and “Wildest” Alternative as they relate to the project objectives.

Code, Land Development Code—Biology Guidelines (see table in MM BIO 5.3-3). In addition, at a minimum, the no net loss creation mitigation (1:1) for eelgrass beds habitat shall be required to occur within Mission Bay itself per the Mission Bay Park Natural Resource Management Plan to the greatest extent feasible. ~~The remaining 1:1 mitigation required may occur outside Mission Bay, if necessary.~~

Further details on eelgrass mitigation would be determined as part of the City’s GDP process.

O21-61: This comment states that the PEIR does not describe how any alternative would or would not meet objective 2 and that there is still an opportunity to work with tribes to adjust any of the project alternatives to provide opportunities for tribal reconnection. PEIR Chapter 3.0, Project Description, states the intent of expanding the wetlands is to provide a natural environment for recreation. The project would also include an Interpretive Nature Center, which would foster opportunities for members of local Tribal nations to reconnect to De Anza Cove. Please refer to Section 8.3, Alternatives Selected for Further Analysis, for a summary of the alternatives to the proposed project and a discussion of their relationship to the project objectives.

O21-62: This comment provides a summary of the Proposed Project, Wetlands Optimized Alternative, and “Wildest” Alternative as they relate to the project objectives. A summary of the alternatives and their relationship to the project objectives is provided in PEIR Section 8.3. See response to comment O21-32.

O21-62
cont.

Table 1. Relationship of Proposed Project, Wetlands Optimized Alternative, and ReWild "Wildest" Alternative to Project Objectives

Objective	Proposed Project	Wetlands Optimized Alternative	ReWild "Wildest" Alternative
1. Provide suitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access.	<ul style="list-style-type: none"> • 45.1 ac of paved bike for guest accommodations. 	<ul style="list-style-type: none"> • 27.4 ac of paved bike for guest accommodations, which could be expanded. In addition, the proposed project for charging stations will be located. • Would increase access to wetlands which are currently restricted. 	<ul style="list-style-type: none"> • Continued access was not detailed in the Feasibility Study, but it is stated that can be used for more of the same as other guest accommodations in the proposed project. • Would increase access to wetlands which are currently restricted.
2. Foster opportunities for members of local Tribal nations to reconnect to De Anza Cove.	The DTRP includes an objective to allow any cultural or spiritual activities that occur on this site. At the same time, the project will also provide an opportunity to work with Tribal nations to adjust any of the project alternatives to provide opportunities for Tribal reconnection.		
3. Incorporate climate adaptation strategies to increase resilience to climate change and mitigate potential sea level rise impacts.	<ul style="list-style-type: none"> • 25.7 ac of planted trees and native species for sea level rise mitigation benefit. • 42.5 ac of the site is planted with vegetation to benefit. 	<ul style="list-style-type: none"> • 25.7 ac of planted trees and native species for sea level rise mitigation benefit. • 25.8 ac of planted trees and native species for sea level rise mitigation benefit. 	<ul style="list-style-type: none"> • 25.7 ac of planted trees and native species for sea level rise mitigation benefit. • 25.7 ac of planted trees and native species for sea level rise mitigation benefit. • 25.7 ac of planted trees and native species for sea level rise mitigation benefit.
4. Embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats within De Anza Cove.	<ul style="list-style-type: none"> • 110.9 ac marsh 	<ul style="list-style-type: none"> • 226.8 ac marsh • Allows more access to marsh to encourage public stewardship through exposure. 	<ul style="list-style-type: none"> • 226.8 ac marsh • Allows more access to marsh to encourage public stewardship through exposure.
5. Diversify active and passive recreational uses that will serve a range of interests, ages, activity levels, incomes, and cultures both on land and in water.	Maximizing the wetland marsh within the project area creates a wide range of opportunities, including open space and walking paths to coastal wetlands that are coastal-dependent species currently within Mission Bay Park. Most of the park is in Mission Bay is designated as wildlife, active recreation, open beach or play fields, while a majority is designated as wetland habitat.		
6. Enhance public access and connectivity within De Anza Cove and increase connections to the surrounding communities, including opportunities for multimodal travel.	<ul style="list-style-type: none"> • Would provide open beach area, and increase connections to the surrounding communities, including opportunities for multimodal travel. 	<ul style="list-style-type: none"> • Would increase access to wetlands which are currently restricted. 	<ul style="list-style-type: none"> • Would increase access to wetlands which are currently restricted. • Includes connections to the shoreline of the wetland, which to enhance opportunities to observe and use some birdwatching through the wetland, and a highland to access of higher elevations.
Recommends additional objectives: 7. Contribute to the improvement of the Park's water quality.	<ul style="list-style-type: none"> • 42.5 ac of the site to provide water quality benefits. • Reducing the Rose Check to De Anza Cove may impact water quality in the bay. 	<ul style="list-style-type: none"> • 226.8 ac of the site to provide water quality benefits. • Reducing the Rose Check to De Anza Cove may impact water quality in the bay. 	<ul style="list-style-type: none"> • 227.2 ac of the site to provide water quality benefits. • Reducing the Rose Check to De Anza Cove may impact water quality in the bay.

References

- Barnard, P.L., Eriksson, L.H., Engrover, A.C., Limber, P.W., O'Neill, A.C., and Vitousek, S., 2018, Coastal Storm Modeling System (CoSMoS) for Southern California, v3.0, Phase 2 (ver. 1g, May 2018); U.S. Geological Survey data release. <https://doi.org/10.5066/77T1S1Q4>.
- California Coastal Commission (CCC) 2018. Sea-Level Rise Policy Guidance. Updated 2018. November 7, 2018.
- California Ocean Protection Council's (OPC) 2018. State of California Sea-Level Rise Guidance, 2018 Update. March 14, 2018.
- Cayan et al. 2008, Griggs et al. 2017. Rising Seas in California. An Update on Sea-Level Rise Science. April, 2017.
- City of San Diego (2019). State Lands Sea Level Rise Vulnerability Assessment. Available online at: <https://www.sandiego.gov/sustainability/resilience>. Accessed April 13, 2023.
- City of San Diego (2020). Climate Change Vulnerability Assessment. Available online at: <https://www.sandiego.gov/sustainability/resilience>. Accessed April 13, 2023.
- City of San Diego (2022). Climate Action Plan. [https://www.sandiego.gov/sites/default/files/san diego% 20% 20climate action plan 0.pdf](https://www.sandiego.gov/sites/default/files/san_diego%20%20climate_action_plan_0.pdf)
- City of San Diego (2023). De Anza Natural Draft Amendment to the Mission Bay Park Master Plan.
- City of San Diego (2025). In the Water, Parks and Recreation. <https://www.sandiego.gov/park-and-recreation/parks/regional/missionbay/waterland>. Accessed April 6, 2025.
- ESA. 2020. Wetland Restoration of Salt Pond 20, Hydrodynamic Modeling Report. Prepared for the San Diego Unified Port District and Great Ecology. March 2020.
- Fourqurean, J.W., Duarte, C.M., Kennedy, H., Marba, N., Homer, M., Matzov M.A., Apostolaki E.T., Kendrick G.A., Krause-Jensen D., McGlathery K.J., and Serrano, O. 2012. Seagrass ecosystems as a globally significant carbon stock. *Nature Geoscience* 5: 505-509.
- National Oceanic and Atmospheric Administration (NOAA). 2010. 2009-2011 CA Coastal California TopoBathy Merged Project Digital Elevation Model (DEM). Downloaded March 21, 2023.
- Pendleton, L., Donato, D.C., Murray, B.C. et al. 2012. Estimating global "blue carbon" emissions from conversion and degradation of vegetated coastal ecosystems. *PLoS ONE* 7: e43542.
- San Diego Audubon Society. 2018. ReWild Mission Bay Wetlands Restoration Feasibility Study Report.
- Smaridon, R.C. 2019. U.S. Clean Water Act policy vs wetland science – nexus or not? In *Wetland Science & Practice* 36(1), 15-22.

Attachment A. Sea Level Rise Technical Assessment

To assess whether the Wetlands Optimized alternative would meet the SEP requirement of 80 acres of wetland by 2100, ESA performed a technical analysis of projected habitat change (i.e., habitat evolution) and resiliency with future sea level rise.

Sea Level Rise Projections and State Guidance

Projections of global sea level rise are well-documented and investigated, with recent research projecting sea level rise on the order of 2 to 10 feet by 2100 in California (e.g., Cayan et al. 2008; Griggs et al. 2017). This research has been used to develop a series of policy guidance documents by the State of California that recommend including specific amounts of sea level rise in project planning and design, the most recent being the California Ocean Protection Council's (OPC) State of California Sea Level Rise Guidance (OPC 2018). The OPC (2018) Guidance includes tables of projected relative sea level rise at well-established tide gauges located along the coast of California through 2150 for a range of risk aversion scenarios, including low, medium-high, and extreme (e.g., T11). Table 1 shows the projections for San Diego Bay, which is the closest water level gauge to Mission Bay. These projections were developed and summarized with the intention that local planning and design efforts would have a consistent and accepted basis for addressing future sea level rise.

The California Coastal Commission (CCC) updated their Sea Level Rise Policy Guidance in 2018 (CCC 2018). The CCC (2018) Guidance provides a basis for selecting the time horizon and the risk level of the project, which are used to define the appropriate sea level rise amounts. The OPC Guidance identifies three levels of risk to consider when planning for sea level rise (blue boxes in Table 2-2):

- The low risk aversion scenario is appropriate for adaptive, lower consequence decisions (e.g., unpaved coastal trails), but is not adequate to address high impact, low probability events.
- The medium-high risk aversion scenario is appropriate as a precautionary projection that can be used for less adaptive, more vulnerable projects or populations that will experience medium to high consequences as a result of underestimating sea level rise (e.g., coastal housing development).
- The extreme risk aversion scenario is appropriate for high consequence projects with little to no adaptive capacity and which could have considerable public health, public safety, or environmental impacts (e.g., coastal power plant, wastewater treatment plant, etc.).

Table 1. Projected Sea Level Rise (in feet) for San Diego

		Wetlands Optimization Alternative (2010) Scenario (2010)				Wetlands Optimization Alternative (2010) Scenario (2010)
		MEAN	LIKELY RANGE	1-IN-20 CHANCE	1-IN-100 CHANCE	
		50% probability sea level rise (m) or greater	65% probability sea level rise (m) or greater	75% probability sea level rise (m) or greater	85% probability sea level rise (m) or greater	
			Low Risk Aversion	Medium-High Risk Aversion	Extreme Risk Aversion	
Wetlands	110		0.9	0.9	0.9	1.1
Wetlands	200	0.7	1.3	0.9	1.0	1.8
Wetlands	300	0.9	0.7	1.2	1.1	2.2
Wetlands	400	1.0	0.7	1.1	1.2	2.2
Wetlands	500	1.2	1.0	1.8	1.9	3.0
Wetlands	600	1.2	0.9	1.6	2.0	3.1
Wetlands	700	1.5	1.1	2.0	2.5	3.4
Wetlands	800	1.4	1.0	1.9	2.4	3.9
Wetlands	900	1.9	1.5	2.5	2.5	4.6
Wetlands	1000	1.0	1.0	2.2	2.0	4.0
Wetlands	1100	2.2	1.6	2.0	2.7	5.2
Wetlands	1200	1.3	1.7	2.5	2.1	5.8
Wetlands	1300	2.6	1.8	2.4	4.5	6.0
Wetlands	1400	1.0	1.3	2.7	2.5	6.4
Wetlands	1500	2.0	2.0	3.7	3.1	7.2
Wetlands	1600	2.0	1.3	3.0	4.7	7.6
Wetlands	1700	3.1	2.5	4.3	3.5	8.8
Wetlands	1800	2.2	1.4	3.3	4.6	8.9
Wetlands	1900	3.5	2.5	4.9	3.3	10.0
Wetlands	2000	2.4	1.5	3.6	5.1	9.9
Wetlands	2100	3.8	2.5	5.4	5.1	11.2
Wetlands	2200	3.5	1.9	3.9	6.7	11.1
Wetlands	2300	4.3	3.0	6.7	10.8	13.0

Wetlands Optimized Alternative Analysis

To assess the potential area of habitat remaining in 2100 in the Wetlands Optimized Alternative, the OPC 2018 low risk aversion scenario (high emissions) was selected. The low risk aversion scenario (3.6 ft of sea level rise by 2100) is likely to occur and is not as extreme as the medium-high scenario.

Zones of general topographic suitability for various tidal and tidally-adjacent habitat types can be defined based on the elevation of the area relative to tidal datums (i.e., as a surrogate for the frequency of tidal inundation). Based on an assessment conducted in South San Diego Bay (ESA 2020), salt marsh habitat typically exists between 2.9 to 6.9 ft NAVD. Below 2.9 ft NAVD, the inundation frequency would be too great to maintain marsh vegetation species, and mudflat or subtidal habitat would occur. Above 6.9 ft NAVD, the habitat would transition to upland habitat. As sea levels rise, habitat elevation bands rise with it. By 2100, with 3.6 ft of sea level rise, salt marsh habitat is expected to occur between 6.5 and 10.5 ft NAVD.

Marsh habitat acreages for 2100 were estimated for the Wetlands Optimized Alternative using the wetlands and uplands areas in PEIR Figure 8-1. ESA developed an approximate terrain by assuming an elevation of 2.9 ft NAVD (lowest saltmarsh elevation discussed above) at the edge of the proposed wetland, an elevation of 6.9 ft NAVD at the inland wetland boundary, and a maximum of 3:1 slope. Varying terrain was assumed in some areas to provide a range of marsh elevations in wetland areas including a high marsh ridge line in the proposed wetland adjacent to Kendall-Frost Marsh, a high marsh ridgeline along the southwest point of the proposed marsh island, and a mid-marsh dip between the two upland areas east of De Anza Cove. The approximate terrain is shown in Figure 1. As mentioned previously, the terrain is entirely assumed based on the wetland extent provided by the PEIR. The PEIR does not provide information about habitat distribution or topography within the wetland area.

Table 2 shows the results of the analysis. Total wetland area in 2100 (including mudflat, but not including Kendall-Frost Marsh) is estimated to be approximately 152 acres. In 2100, mudflat comprises a majority of the total wetlands area at 124 acres while low, mid, and high marsh combined comprise only 28 acres (Figure 2). Because the current plan is estimated to result in mostly mudflat habitat compared to salt marsh habitat, more of the upland and future marsh area should be set as undeveloped and graded at a very shallow slope. This would allow for the salt marsh habitat (low, mid, and high marsh) to have more room to move upslope as sea levels rise and increase the likelihood of this important habitat remaining through 2100.

TABLE 2
HABITAT ACREAGES WITH SEA-LEVEL RISE

Habitat	Elevation Band (feet NAVD)	Post-Construction (acres)	With 3.6 ft of Sea Level Rise in 2100 (acres)
Upland	> 0.9	49	37
High Marsh	5.7 to 6.9	46	3
Mid Marsh	4.1 to 5.7	60	6
Low Marsh	2.9 to 4.1	48	21
Mudflat	± 4 to 2 ±	0	124
Subtidal	< 0.4	87	8*



Figure 1
Vegetation Distribution



Intentionally Left Blank

Comment Letter O22: San Diego Outrigger Canoe Club, April 20, 2023

O22

From: [Dave Greeley](#)
To: [PLN_PlanningCEQA](#)
Cc: [Carmie Arnesen](#); [David Greeley](#)
Subject: [EXTERNAL] Draft Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan
Date: Thursday, April 20, 2023 4:47:19 PM
Attachments: [2023.04.20.Ltr.from.SDOCC.to.SDPD.pdf](#)

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O22-1

Please see the enclosed letter addressed to the City of San Diego Planning Department concerning the Draft Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan.

Please feel free to reach out to me with ny questions.

Sincerely,

David Greeley
San Diego Outrigger Canoe Club

O22-1: This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.



City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, California 92123

Via email: PlanningCEQA@sandiego.gov

**Subject: Draft Program Environmental Impact Report for the De Anza Natural
[Amendment to the Mission Bay Park Master Plan (SCH No. 22018061024)]**

To Whom it May Concern:

The San Diego Outrigger Canoe Club (SDOCC) is writing in response to the City of San Diego's (City) Draft Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (Amendment). Individual SDOCC members have provided verbal (in public meetings) and written comments to the City concerning the Amendment or other similar projects in the same area with different names (i.e., De Anza Revitalization Plan, De Anza Cove Amendment to the Mission Bay Park Master Plan) since 2017.

O22-2

SDOCC is a 501(c)(3) nonprofit recreational paddling organization that provides low-cost recreational opportunities. SDOCC has been based out of Campland on the Bay (Campland) since 1985, where we house our outrigger Canoes—6 six-person canoes approximately 40 feet in length, and close to 40 one-person canoes approximately 18 feet in length. Campland is one of very few locations on Mission Bay that provides safe storage and launching of these canoes. Planning for Fiesta Island removed one of the last remaining alternatives for this water dependent use.

Section 5.1.2 of the PEIR, Land Use, provides that a significant impact under CEQA would occur if implementation of the project would:

- 1. Conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation, and as a result, cause an indirect or secondary environmental impact.

O22-3

The analysis in sections 5.1.3.1.b and 5.1.3.1.g fails to adequately identify impacts to Section 30001.5 (d) Legislative findings and declarations; goals of the California Coastal Act, which requires that development:

- Ensure priority for coastal-dependent and coastal-related development over other development on the coast.

O22-2: This comment describes the San Diego Outrigger Canoe Club (SDOCC) and its relation to Campland on the Bay (Campland). The City of San Diego (City) appreciates the SDOCC's participation in the review of the PEIR for the project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

O22-3: This comment states that the PEIR land use compatibility analysis was not sufficient because it fails to adequately identify or address impacts to existing water-dependent uses, including the SDOCC, which is based out of Campland, and cites sections from the California Coastal Act (CCA). Although PEIR Chapter 2.0, Environmental Setting, does not specifically mention the SDOCC as a use within in the project area, it does states that the project area includes Campland, which is operated as an RV and tent camping resort and includes the Campland Cantina and public access. In response to this comment, PEIR Section 2.3.1.1, Existing Land Uses was revised as follows:

Campland is approximately 45.8 acres and directly east of the KFMR/NWP. Campland is on a City-owned leasehold that is privately operated as an RV and tent camping resort and includes the Campland Cantina and public access. The San Diego Outrigger Canoe Club is currently based out of Campland.

As discussed in PEIR Chapter 3.0, Project Description, the project would enhance the existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations (RVs and other low-cost camping facilities),

active and passive recreational opportunities to enhance public use of the area, and improvements to access to recreational uses. Furthermore, PEIR Chapter 3.0 states that non-motorized watercraft access (including outrigger canoes) would be provided on De Anza Cove at the proposed Boat Facilities/Clubhouse land use and/or in association with the low-cost visitor guest accommodation lease.

PEIR Section 5.1, Land Use, includes analysis of the project's compatibility with the CCA. As discussed in PEIR Section 5.1, the project includes a Local Coastal Plan Land Use Plan that requires approval by the City and certification by the California Coastal Commission. PEIR Appendix B, Land Use Consistency Tables, demonstrates that the project would not conflict with the CCA because the project would provide recreational opportunities and public access to the shoreline and would include low-cost visitor guest accommodations, consistent with the policies of the CCA. Specifically, the analysis states that the project is an Amendment that includes language supporting the protection of water-oriented recreational activities along the De Anza Cove shoreline and would include a beach and new boat facilities consistent with CCA Section 30220, Protection of Certain Water-Oriented Activities. In addition, the analysis states that the project is an Amendment that would include new boat facilities within De Anza Cove, consistent with CCA Section 30224, Recreational Boating Use; Encouragement; Facilities. Therefore, the PEIR adequately addresses land use compatibility with the CCA, and no revisions to the PEIR are warranted.

O22-3
cont.

The analysis is not sufficient to identify incompatibilities with the goals of the Amendment, because it does not identify SDOCC's ongoing water dependent use with a 38-year history in the area. While SDOCC's uses are not cited within the plan, CEQA addresses existing conditions of a planning or project area. As SDOCC's 38-year existing use was not included in the Environmental Setting chapter or Environmental Baseline subsection of the PEIR, the analysis in section 5.1.3.1.b fails to adequately identify or address impacts to existing water-dependent uses. Furthermore, section 5.1.3.1.g of the PEIR states:

g. California Coastal Act The CCA requires projects within the Coastal Overlay Zone to be consistent with standards and policies addressing public access, recreation, marine environment, land resources, development, and industrial development. The proposed project includes an LCP Land Use Plan that requires approval by the City and certification by the California Coastal Commission. Appendix B demonstrates that the project would not conflict with the CCA because the project would provide recreational opportunities and public access to the shoreline and would include low-cost visitor guest accommodations, consistent with the policies of the CCA. Therefore, impacts would be less than significant.

O22-4

As stated in the PEIR, the project is consistent with the California Coastal Act because it provides recreational opportunities and public access to the shoreline; however the PEIR fails to mention that the project also eliminates a long-term, ongoing, low-cost, water dependent recreational opportunity by eliminating the storage and launching area for SDOCC. Therefore, the plan and project cannot be consistent with the California Coastal Act without the inclusion of either onsite facilities or protected alternatively sited storage and launching access. Please note that boat launching ramps, steep berms, docks, or areas with riprap cannot be considered as alternative sites.

Section 3.3.1.3 Circulation and Access states:

O22-5

b. Watercraft Access would be provided on De Anza Cove at the proposed Boat Facilities/Clubhouse land use and/or in association with the low-cost visitor guest accommodation lease. The existing boat ramp along the western bank of Rose Creek would be removed for shoreline "wilding" with nature-based designs and BMPs. Non-motorized personal watercraft would have access on De Anza Cove at the Boat Facilities/Clubhouse location identified on Figure 3-1, Site Plan). No changes to land use are proposed for the existing boat ramp that is southeast of the project area and is easily accessed from Interstate 5. The layout of the proposed boat facility could be designed during a GDP process for the greater De Anza Cove area or as a separate, more focused GDP process for the De Anza Cove boat facility.

O22-4: This comment states that the PEIR's consistency analysis with the CCA fails to mention that the project eliminates a long-term, ongoing, low-cost, water-dependent recreational opportunity by eliminating the SDOCC's storage and launching area. As mentioned in response to comment O22-3, the Final PEIR has been revised to include the existing SDOCC use at Campland.

The comment also states that, without the analysis, the Mission Bay Park Master Plan (MBPMP) and project cannot be consistent with the CCA without the inclusion of on-site facilities or protected alternative storage sites and launching access. Please refer to response to comment O22-3 regarding the PEIR's land use consistency analysis with the CCA.

As explained in the PEIR, California Environmental Quality Act (CEQA) Guidelines, Section 15168(a), states that "A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) Geographically, (2) As logical parts in the chain of contemplated actions, (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

CEQA Guidelines, Section 15146, defines the degree of specificity necessary in an EIR: "The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." Therefore, an EIR for a project such as the adoption of a Master Plan Amendment should focus on the secondary

effects that can be expected to follow from the adoption or Amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow. Therefore, the PEIR does not serve as a project-level environmental analysis for any specific development project, and adequate information is not available at this time to address potential future site-specific impacts of the project.

Furthermore, the PEIR acknowledges that the City will evaluate future detailed General Development Plans (GDPs) for future projects as they are developed. A GDP, as defined in City Council Policy 600-33, is a Conceptual Master Plan that identifies the specific activities and amenities to be included within a park. As described in PEIR Section 1.4.1, Type of PEIR, GDPs will be developed over time and will provide precise engineering and construction plans for the recreational elements of the project. Once the project design has been completed, prior to approval, the City will route the future project through the Public Project Assessment process, which includes the preparation of the appropriate environmental documentation in accordance with CEQA. At that time, specific mitigation measures will be developed based the site-specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. At this point, public and agency comments will be invited to address the site-specific impacts identified in the future CEQA documentation. As part of a future GDP, the PEIR does not preclude the relocation of activities associated with the SDOCC. No revisions to the PEIR are warranted.

O22-5 cont. | The project description in section 3.3.1.3 Circulation and Access fails to adequately provide for equivalent non-motorized craft storage and launching areas from what is currently existing for SDOCC at Campland. As stated above, this removal of equivalent areas creates an inconsistency between the plan and the California Coastal Act.

O22-6 | As stewards and enthusiasts of Mission Bay, SDOCC supports this plan and Campland; however existing non-motorized craft storage and launching access must be included in this plan and project description, or provided an equivalent alternative to maintain a Less than Significant level of impact.

Sincerely,

Carrie Loden, President, SDOCC

David M. Greely, Esq., Vice President, SDOCC



O22-5: This comment states that the project description fails to adequately provide for equivalent non-motorized craft storage and launching areas from what is currently existing for the SDOCC at Campland and that the removal of equivalent areas creates an inconsistency between the MBPMP and the CCA. Please refer to response to comment O22-3. The PEIR does not preclude the relocation of activities associated with the SDOCC. As an example, the layout of the proposed boat facility could be designed during a GDP process for the greater De Anza Cove area or as a separate, more focused GDP for the De Anza Cove boat facility. No revisions to the PEIR are warranted.

O22-6: This comment provides support for the MBPMP and Campland and reiterates that non-motorized craft storage and launching access must be maintained. Please refer to response to comment O22-5.

Comment Letter O23: Southwest Wetlands Interpretive Association, April 20, 2023

O23

From: [Bill Tippetts](#)
To: [DM_Hatman@CDOS](#)
Cc: [Eva Stover](#); [Sam Rowan](#); [John Fontenot](#); [Andres Bivar](#); [Tim Bush](#); [Seagal Stasi](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Master Plan PEIR
Date: Thursday, April 20, 2023 2:55:38 PM
Attachments: [DeAnza Natural - Bill's comments 4/20/2023.docx](#)

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City of San Diego,

The Southwest Wetlands Interpretive Association submits the attached comments on the referenced document. Many of our comments are also included in the San Diego Audubon Society's ReWild Coalition letter, of which we are a member.

Please keep SWIA informed of actions on this project. Our contact is Bill Tippetts, Secretary of the Board

Regards,

Bill Tippetts (billtippetts@gmail.com)

O23-1: This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Please refer to responses to comment letter O21, Rewild Coalition. No further response is warranted.

O23-1



Southwest Wetlands Interpretive Association
PO Box 575
Imperial Beach, CA 91933

20 April 2023

Scott Sandel
City of San Diego Planning Department
9485 Aero Dr
San Diego, CA 92123

(submitted 20 April 2023 via email to ssandel@sandiego.gov)

Subject: De Anza Natural Amendment to the Mission Bay Park Master Plan PEIR

Dear City of San Diego/Mr. Sandel:

The Southwest Wetlands Interpretive Association (SWIA) is a non-profit organization dedicated to helping preserve and enhance wetlands throughout southern California – and particularly in the Tijuana River watershed and South San Diego Bay. Historical losses of over 95% of Mission Bay wetlands have occurred from development, and climate change and sea level rise represent significant additional threats to natural resources and infrastructure/developments in Mission Bay. SWIA supports planning that will implement wetlands restoration/creation that is sustainable and enhances these public trust wetlands and water of De Anza Cove and nearby portions of Mission Bay.

We have reviewed the PEIR and provide the following comments, many of which were included in the ReWild Coalition letter that San Diego Audubon Society has submitted. As described below, we believe the PEIR is inadequate and needs to be revised to provide more accurate analyses, and new findings regarding the most appropriate project for the area.

General Comments

The project objectives are too vague to be effective for evaluating alternatives. And importantly, fail to adequately prioritize water quality improvements in Mission Bay as required by the 1994 Mission Bay Park Master Plan. Add a specific project objective to "improve the water quality of the study area and the bay through natural, resilient infrastructure."

The draft PEIR is missing details on foreseeable impacts from sea level rise that must be part of the analysis for determining the best land-use plan.

O23-2

O23-3

O23-4

O23-2: This comment summarizes the mission of the Southwest Wetlands Interpretive Association. This comment provides an introduction to the comment letter and summarizes that the PEIR is inadequate and needs to be revised to provide more accurate analyses.

O23-3: This comment states that the project objectives are too vague and fail to adequately prioritize water quality. The project objectives listed in PEIR Chapter 3, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Chapter 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

O23-4: This comment states that the draft PEIR is missing details on foreseeable impacts from sea level rise. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise scenario.

O23-5 The city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035. The ReWild "Wildest" plan provides the city with one of the best ways to achieve this goal, but the draft PEIR for the De Anza Natural plan inaccurately dismisses the ReWild proposal by summarily concluding it fails to meet project objectives.

O23-6 The city's proposal fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. All San Diegans, including our Kumeyaay neighbors and those in underserved communities, will benefit with access to a vibrant tidal marsh.

Specific Comments

O23-7 Page 5-2. Project Objectives. These "objectives" are written as general project goals rather than project objectives. They are too vague to be used for the purpose of effectively developing the proposed project and evaluating the potential alternatives to the proposed project. The objectives should provide clear, more specific components for each objective. The objectives must also reflect and include relevant requirements and commitments for this portion of Mission Bay Regional Park, such as providing "A large saltwater marsh that enlarges the Northern Wildlife Reserve is proposed west of Rose Creek adjacent to the existing Northern Wildlife Preserve, and along Rose Creek and where the creek merges with Mission Bay." (as specified in the March 2023 Draft De Anza Cove Natural Amendment). Similarly, the City has committed, pursuant to its RWQCB grant funding (R9-2020-0150 SEP), to create an "expanded wetland alternative [that] would maximize implementable wetland restoration reflective of existing feasibility studies for Mission Bay..." Each of the objectives must be rewritten to provide at least that level of clarity and specificity.

O23-8 Page 5-7. Environmentally Superior Alternative. The PEIR states that the "No Project/No Build Alternative" is the environmentally superior alternative because it "would avoid ground disturbance that could result in impacts to subsurface archaeological resources or Tribal Cultural Resources (TCRs), and would reduce the project's significant and unavoidable impacts on historical, archaeological, and TCRs." However, the PEIR also states that this alternative would not meet all of the project objectives, and in Chapter 8 that analyzes the alternative, it identifies numerous areas for which impacts would be greater than the proposed project – and other alternatives. [As we stated above, those must be more clear, specific, and address environmental, recreational and all other relevant commitments for the project area.] Therefore, it cannot be the superior alternative if it would not meet the essential commitments that the City has made and has similar or more impacts than the other alternatives. See our comments on the alternatives section.

Page 5-9, et seq. (Table 5-4).

O23-9

- Under Land Use (MSCP), the impact analysis is stated: "Impacts would be potentially significant," but then no mitigation measures are identified and the impact level after mitigation

O23-5: The comment states that the PEIR fails to consider the ReWild Mission Bay "Wildest" proposal in relation to the City's Climate Action Plan (CAP) restoration goal of 700 acres of restored tidal marsh by 2035.

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. PEIR Chapter 8.0 evaluates four alternatives that were selected for additional analysis; in addition, PEIR Chapter 8.0 also identifies the ReWild Mission Bay "Wild," "Wilder," and "Wildest" alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the Re-Wild Mission Bay "Wildest" proposal, is provided in PEIR Chapter 8.0.

Other restoration areas within the City's jurisdiction are being considered to meet the goals of the City's Climate Action Plan (CAP). The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 225.1 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop

an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

O23-6: This comment states that the PEIR fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem, and that all San Diegans will benefit from access to a vibrant tidal marsh. The City concurs that access to a restored tidal ecosystem would be a benefit to all San Diegans, including members of local Tribal nations. However, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." No revisions to the PEIR are warranted.

O23-7: This comment states that the project objectives are written as general project goals rather than project objectives and are too vague to be used for developing the proposed project and evaluating the potential alternatives. The project's objectives, which are defined in PEIR Chapter 3.0: Project Description, explain the underlying purpose of the project and are used to develop a reasonable range of alternatives in line with the requirements of CEQA Guidelines Section 15124. No revisions to the Draft PEIR are warranted.

O23-8: This comment disagrees that the No Project/No Build Alternative can be identified as the environmentally superior alternative if it would not meet the essential commitments that the City has made and has similar or more impacts than the other alternatives. The criteria for the selection and analysis of alternatives are provided in CEQA Guidelines, Section 15126.6(c). The alternatives must (1) meet most of the project objectives, (2) be feasible, and (3) avoid or substantially lessen the significant impacts resulting from the project. As described in PEIR Chapter 5.0, Environmental Analysis, the proposed project would result in potentially significant impacts, prior to mitigation, for the following issues topics: biological resources; hazards and hazardous materials; historical, archaeological, and Tribal Cultural Resources (TCRs); paleontological resources; and noise. The project would result in potentially significant cumulative impacts, prior to mitigation, for the following issue topics: historical, archaeological, and TCRs.

PEIR Table 8-6, Summary of Impacts for Alternatives Compared to the Proposed Project, provides a summary comparison of the alternatives with the proposed project to highlight if the alternatives would result in a similar, greater, or lesser impacts. As discussed in PEIR Chapter 8.0, Alternatives, the level of environmental impacts associated with the No Project/No Build Alternative is less than the proposed project, as this alternative would avoid ground disturbance that could result in impacts to subsurface archaeological resources or TCRs and would reduce the project's significant unavoidable impacts on historical, archaeological, and TCRs. The No Project/No Build Alternative would be considered the

environmentally superior alternative. However, according to Section 15126.6 of the CEQA Guidelines, if the No Project Alternative (No Project/No Build Alternative) is selected as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. The PEIR concludes that based on a comparison of the alternatives' overall environmental impacts and their compatibility with the project's goals and objectives, the Enhanced Wetlands/Optimized Parkland Alternative is the environmentally superior alternative for this PEIR. No revisions to the Draft PEIR are warranted.

O23-9: This comment states that the PEIR contradicts itself in stating that the project would not conflict with the provisions of the MSCP but also states that impacts would be potentially significant which should be clarified. As discussed in PEIR Section 5.1, Land Use, and PEIR Section 5.3, Biological Resources, the project is required to document compliance with the MSCP SAP and must comply with the General Planning Policies and Design Guidelines provided in Section 1.4.2 of the MSCP SAP, General Management Directives outlined in Section 1.5.2 of the MSCP SAP, species-specific Area-Specific Management Directives provided in the MSCP SAP Appendix A, and the MSCP SAP Siting Criteria (City of San Diego 1997). The project would be consistent with the policies and requirements of the MSCP SAP, and no impact would occur. In response to this comment Table S-4, Summary of Significant Environmental Impacts has been revised as follows:

O23-9
cont.

is "Less than Significant." If the results of the impact analysis in the Land Use section of the PEIR found no significant impacts, then this summary text needs to be corrected.

O23-10

• Under Biological Resources (Page S-19), the text states "Would the proposed project interfere substantially with the movement of any native resident or migratory fish or wildlife species..." and found that it would not and proposed no mitigation. Because the project and most alternatives would affect a portion of lower Rose Creek, which supports native species, it would appear that potentially significant impacts could result, which would necessitate mitigation measures. MM BIO 5.3-2 through MM BIO 5.3-5 would appear to reduce those potential impacts to less than significant, and the text should be reflect the potential impacts and the application of those mitigation measures.

O23-11

• The Greenhouse Gas Emission section found no potential impacts because the proposed project would conform to City, regional and state climate plans. However, the proposed project, and any similar project, will eventually involve construction and significant earthmoving, dredging, and filling that will have at least temporary elevated GHG emissions. How or whether conformance to those plans would result in no significant project impacts (even if construction period-related only) cannot be assured. This region has not demonstrated that emissions will be reduced to meet current state GHG reduction targets. Absent more project information and mitigation measures it is not defensible to state that the project may have no significant emissions. It seems that a more appropriate finding would be that approval of the proposed project (or similar alternative) has a potentially significant impact to GHG emissions, but that that conforming to those plans – and perhaps additional specific emission reduction measures developed when the project-level EIR analysis is produced, is expected to reduce those to less than significant. That approach would be comparable to the Biological Resources section analysis in that, while approving the PEIR will not itself have biological impacts (it is only a plan), the PEIR correctly identified numerous potential biological impacts from subsequently implementing a specific project, such that the PEIR is required to make a "significant impact" finding and identify mitigation measures.

O23-12

• The Hydrology and Water Quality section acknowledges potential water quality impacts and states: "Implementation of the project could result in pollutants generated during construction and operation. Pollutants generated during construction would be temporary and be addressed through preparation of a project-specific Stormwater Pollution Prevention Plan and implementation of construction BMPs." It is not assured that BMPs alone would prevent water quality impacts and the PEIR should identify that potential and include a set of general water quality mitigation measures, similar to what has been done for potential impacts to biological resources. Improved water quality must be an essential component of the project, but that has not been appropriately addressed by the project nor analyzed by the PEIR.

O23-13

Page 3.2 et seq (Project Description). We disagree that the Proposed Project is appropriate and best meets the project objectives – which as we stated in our comments above need to be more clear, specific, and include commitments that the City has made regarding the De Anza Cove area. Of

Environmental Issue	Results of Impact Analysis		Impact Level After Mitigation
	Land Use	Mitigation	
Would the proposed project conflict with the environmental goals, objectives, or guidelines of a General Plan or other applicable land use plan or regulation and as a result, cause an indirect or secondary environmental impact?	Implementation of the project would not conflict with the environmental goals, objectives, or guidelines of the City's General Plan or other applicable land use plan or regulation, including the MBPMP, Land Development Code, 2021 Regional Plan, CAP, Climate Resilient SD Plan, California Coastal Act, Mission Bay Natural Resources Plan, Pacific Beach Community Plan and Local Coastal Plan, or Balboa Avenue Station Area Specific Plan and, as a result, cause an indirect or secondary environmental impact. Impacts would be less than significant.	No mitigation measures required.	Less Than Significant
Would the proposed project lead to the development or conversion of General Plan or Community Plan designated Open Space or Prime Farmland to a more intensive land use, resulting in a physical division of the community?	Implementation of the project would not lead to the development or conversion of General Plan or Community Plan designated Open Space or Prime Farmland to a more intensive land use, resulting in a physical division of the community. No impact would occur.	No mitigation measures required.	No Impact
Would the proposed project conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan?	Implementation of the project would not conflict with the provisions of the City's MSCP Subarea Plan or other approved local, regional, or state Habitat Conservation Plan. Impacts would be potentially significant. No impact would occur.	No mitigation measures required.	Less Than Significant No Impact
Would the proposed project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?	The project is not located in an airport influence area, and implementation of the project would not result in land uses that are not compatible with an adopted ALUCP. No impact would occur.	No mitigation measures required.	No Impact

O23-10: This comment states that significant impacts to native migratory fish could occur because the preferred project and most alternatives would affect a portion of lower Rose Creek. As discussed in PEIR Section 5.3, Biological Resources the project would provide an overall enhancement of wildlife movement opportunities throughout much of the project area by establishing native wetland habitat in areas that were previously developed, disturbed, or underwater, which would provide additional foraging habitat and cover for wildlife movement. While project activities may temporarily disrupt wildlife movement through the project area, the project is not expected to have a significant impact on habitat linkage over the long-term because the overall habitat quality of the existing corridors would increase as a result of project implementation. Furthermore, the PEIR identifies that temporary construction-related and long-term operational indirect impacts to wildlife movement

corridors and habitat connectivity could occur as a result of lighting, increased human activity, hydrologic quality (increased turbidity, excessive sedimentation, flow interruptions, and changes in water temperature), noise, vibration, and trash and garbage, which can attract both introduced terrestrial and native terrestrial and avian predators. The proposed project would comply with the Multiple Species Conservation Program Subarea Plan (MSCP SAP), the San Diego Regional Water Quality Control Board Municipal Permit, the City's Stormwater Standards Manual, and National Pollution Discharge Elimination System (NPDES) regulations, through implementation of site design, source control, and incorporation of construction and permanent best management practices (BMP). Therefore, no revisions to the PEIR are warranted.

O23-11: This comment disagrees with the PEIR conclusion that the project would result in less than significant impacts related to greenhouse gas (GHG) emissions, since it will involve significant earth moving activities. As discussed in PEIR Section 5.4, Greenhouse Gas Emissions, any increase in GHG emissions associated with the construction and operation of the proposed project were included in the City's Climate Action Plan (CAP) GHG emissions inventory and business-as-usual GHG emissions projections prepared for the 2022 CAP. Temporary project construction emissions were included in the CAP GHG emissions inventory and business-as-usual GHG emissions projections and, thus, were accounted for in the CAP. The CAP Consistency Regulations contain measures that are required to be implemented on a project-by-project basis to ensure that the GHG emissions reduction targets identified in the CAP are achieved. Therefore,

compliance with CAP Consistency Regulations upon implementation of the proposed project would result in less than significant impacts associated with GHG emissions. The project is adequately analyzed in the PEIR, and no revisions are warranted.

O23-12: This comment states that the PEIR should include a set of general water quality mitigation measures and that improved water quality must be an essential component of the project, but that it has not been appropriately addressed. As stated in PEIR Chapter 3.0, Project Description, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. PEIR Section 5.7, Hydrology and Water Quality, disclosed that the project would have the potential to result in long-term operational pollutants associated with components of the project, such as guest accommodations, parking areas, and street improvements that would introduce potential pollutants, including sediments, heavy metals, nutrients, trash and debris, oxygen-demanding substances, oil and grease, pesticides, and bacteria and viruses. Due to the project's location within and adjacent to Rose Creek and Mission Bay, the immediate pollutants of concern are those that contribute to the eutrophic conditions at the mouth of the Rose Creek inlet (nutrients) and the high coliform counts along the Mission Bay shoreline. In addition, the expansion and regrading required for wetland restoration could lead to increased erosion.

PEIR Table 5.7-1, Recommended Best Management Practices, provides a preliminary list of recommended

BMPs and would be refined and implemented as part of final project design and monitoring programs for future project activities consistent with the project in accordance with the City's Stormwater Standards Manual that requires the preparation of a Stormwater Quality Management Plan (SWQMP). In addition, proposed water quality detention basins would be of differing sizes and would capture and treat stormwater before flowing into Mission Bay. Water quality detention basins would be designed with a sediment forebay, a height-appropriate embankment specific for each area of treatment, and a base to reduce sediment and erosion at the outflow. Native plants would be used to reduce sediment and total suspended solids from stormwater. Additional water quality-enhancing features would include vegetated areas bordering all development to reduce stormwater contamination, including debris and sediment, from reaching Mission Bay. Revegetating the edges of Rose Creek and along the boot of De Anza Cove with marsh, wetland, and upland native plants would create another water quality-enhancing feature.

As described in PEIR Section 1.4.1, Type of PEIR, General Development Plans (GDPs) will be developed over time and will provide precise engineering and construction plans for the various elements of the project. Since these plans are currently not available at the planning level, their environmental impacts have been estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements. Once the project design has been finalized and prior to approval,

O23-13 cont. particular concern is the proposed (low cost accommodations) development on the “boot” area south of the identified new channel. That would reduce the potential to meet the expanded saltmarsh/wetlands commitments and also would introduce many impacts (noise, lighting, general human activities) to the adjacent wetlands.

O23-14 And, as noted previously, we believe that the list of project objectives is inadequate to be used to develop and evaluate a proposed project and alternatives. Nowhere in the PEIR is there a substantive elucidation of what those vague project objectives (which are in essence just general goals) should involve and they fail to incorporate the City’s existing commitments for both environmental, recreational, and low cost accommodations within the project area. And to reiterate, the project must explicitly include an objective to improve water quality.

O23-15 Page 8-1 et seq. (Alternatives). As we have stated in preceding comments, the project objectives are insufficient because they are neither sufficiently clear and specific to understand how they are used to develop and evaluate the proposed project and alternatives, nor do they incorporate significant commitments that the City has made regarding wetlands expansion, water quality improvements and even recreational/low cost accommodations. The project objectives should be revised, include more specificity, and a table prepared to demonstrate how – or not – each alternative conforms to them. As a general statement about the final section of each alternative’s assessment (Relationship to Project Objectives), they provide varying if not different kinds of “evidence” (with no specific criteria) to support how the alternative meets or does not meet – in full or partially – the six objectives. The PEIR needs to provide a table that uses consistent, clear and more specific criteria to summarize how the alternatives are determined to meet or not the objectives – modified as we have recommended in preceding comments.

O23-16

- The ReWild Coalition letter provides details regarding why its alternatives, especially the Wildest option, should be treated as legitimate project alternatives. The draft PEIR must prepare a table comparable to the ones for the proposed project and analyzed alternatives showing acreages for each use to identify the potential acreages that could be allocated to each use that is addressed in the proposed project or alternative projects.

O23-17

- No Project Alternative. The analysis of this alternative identifies many impacts compared to the proposed project and other alternatives, including but not limited to: “Therefore, under the No Project/No Build Alternative, impacts associated with conflicts with the applicable air quality plan and operational air quality would be greater compared to the proposed project;” “Therefore, the No Project/No Build Alternative would result in greater operational GHG emissions compared to the proposed project;” “Therefore, the No Project/No Build alternative would result in greater hydrology and water quality impacts compared to the proposed project;” etc. Additionally, compared to the proposed project and most alternatives, it would not “...expand habitat areas, resulting in long-term benefits to wetland habitat, species, and the functions and values of the aquatic resources...” Other than avoiding potential impacts to historical, archaeological and tribal cultural resources that the proposed project and other alternatives may cause (and whose mitigation may or may not be avoidable and mitigable at the

the City will route the project through the Public Project Assessment process, including the preparation of the appropriate environmental documentation in accordance with California Environmental Quality Act (CEQA). At that time, specific mitigation measures will be developed based on the site -specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. The City also acknowledges that, due to lack of detail and site design in the PEIR, many future projects will undergo site-specific CEQA review, which is the appropriate time to evaluate site-specific impacts. No revisions to the Draft PEIR are required. No revisions to the Draft PEIR are required.

O23-13: This comment states that the low-cost visitor accommodations would reduce the potential to meet the expanded saltmarsh/wetlands commitments and also would introduce many impacts (noise, lighting, general human activities) to the adjacent wetlands. The MBPMP calls for a “balanced approach” (City of San Diego 2021a) with three components: recreation, commerce, and environment. PEIR Section 5.3: Biological Resources concludes that permanent edge effects could result during operation of the proposed project, including the low cost visitor accommodations, and may include intrusions by humans and domestic pets and therefore possible trampling of individual plants, invasion by exotic plant and wildlife species, exposure to urban pollutants (fertilizers, pesticides, herbicides, and other hazardous materials), soil erosion, litter, fire, and hydrologic changes (e.g., surface and groundwater level and quality). The project is required to comply with the MSCP SAP, the San Diego Regional Water Quality Control Board (RWQCB) Municipal Permit, the City’s Stormwater Standards Manual, and National

Pollution Discharge Elimination System (NPDES) regulations, through implementation of site design, source control, and incorporation of construction and permanent best management practices (BMP). Through compliance with these regulations, potential edge effects would be adequately considered, addressed, and minimized.

Please refer to response to comment O23-14 that describes the GDP process. As future site-specific projects come forward, project-specific analysis would be conducted in the review GDP review phase of the project including potential edge effects.

O23-14: This comment again reiterates that the list of project objectives is inadequate to be used to develop and evaluate a proposed project and alternatives. Please refer to response to comment O23-3 that discuss water quality and O23-7 that discusses the project objectives.

O23-15: This comment states that the Draft PEIR objectives need to be revised. In addition, the comment states that the PEIR Alternatives Section needs to provide a table that uses consistent, clear, and more specific criteria to summarize how the alternatives are determined to meet or not the objectives. Please refer to response to comment O23-7 that discusses the project objectives. As discussed in PEIR Chapter 8.0, Alternatives, the alternatives addressed in the PEIR were selected based on the extent to which they would feasibly accomplish most or all of the project objectives described in PEIR Chapter 3.0, Project Description. PEIR Chapter 8.0, Alternatives, evaluates four alternatives that would reduce impacts compared to the

O23-17
cont.

project level, this "alternative" does not justify to be the environmentally superior alternative.

O23-18

- Wetlands Optimized Alternative. The PEIR states this alternative would be consistent with the SANDAG Regional Plan, enhance access and safety getting to the site and encourage multimodal transportation options, both locally and outside the local area. However, the analysis later identifies that this alternative would have lower or similar GHG emissions while causing higher VMT (because of a reduction in low-cost accommodations and other recreational activities that would then force potential visitors to use other facilities outside the project area). It is unclear how much re-directed travel would actually occur and if much of that driving originated outside the local area, whether it would even be significant.

O23-19

We do not agree with the PEIR's conclusions: "However, the Wetlands Optimized Alternative would not meet project objectives 1 and 6 because, compared to the proposed project, it would not as fully provide equitable access or enhance the public access of De Anza Cove. The Wetlands Optimized Alternative would convert the southern portion of the developed De Anza "beach" and the De Anza Cove open water areas to wetlands. This would result in a reduction in low-cost visitor guest accommodations and open beach uses. Furthermore, the Wetlands Optimized Alternative would not fully implement project objective 5, as active and passive recreational uses would be further reduced, therefore also reducing the customer base and opportunities for passive and active recreation, compared to the proposed project." The project objectives do not identify any specific set of criteria for "equitable access or enhance public access" or what number of low-cost accommodations and level of beach uses or what level of active and passive recreational uses are desired and appropriate. Absent clarity on those project objectives – and as we reiterate on all project objectives – this is not a justified conclusion with adequate supporting documentation.

O23-20

- Neither the Enhanced Wetlands/Optimized Parkland Alternative nor Resiliency Optimized Alternative appear to meet the (current) project objectives.

O23-21

- It is unclear how the PEIR can conclude that the Environmentally Superior Alternative is the No Project when, as described above, it has many potentially greater impacts than the proposed project and, from our review and assessment, than the Wetlands Optimized Alternative. In addition, it fails to meet most of the project objectives. The PEIR does not adequately justify that conclusion.

Sincerely,

Mike McCoy

Mike McCoy
President

Bill Tippets

Bill Tippets
Board Member

proposed project (No Project/No Build Alternative, Wetlands Optimized Alternative, Enhanced Wetlands/Optimized Parkland Alternative, and Resiliency Optimized Alternative). The analysis includes a discussion of the proposed alternatives relationship with the project objective. No revisions to the PEIR are warranted.

O23-16: This comment states that The ReWild Coalition letter provides details regarding why its alternatives, especially the Wildest option, should be treated as legitimate project alternatives. Please refer to responses to comment letters O21 and O23-5.

O23-17: This comment disagrees that the No Project/No Build Alternative can be identified as the environmentally superior alternative. Please refer to response to comment O23-8 that discusses the environmentally superior alternative.

O23-18: This comment states that it is unclear how much re-directed travel would occur under the Wetland Optimized Alternative which would result in higher VMT. The PEIR goes above the requirements of CEQA by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b). As discussed in PEIR Chapter 8.0, the Wetlands Optimized Alternative would result in fewer vehicle trips than those generated under the proposed project due to a reduction in traffic-generated uses on site. Compared to the proposed project, the Wetlands Optimized Alternative would create additional acreage of wetlands and upland habitat while reducing the acreages

of the active recreation and low-cost visitor guest accommodations. With the reduction of low-cost visitor guest accommodations, the regional service area of the remaining coastal accessible facilities would expand compared to the proposed project. The service area is the same as that for the proposed project and focuses on publicly accessible coastal low-cost visitor guest accommodation facilities including South Carlsbad State Beach, San Elijo State Beach, Silver Strand State Beach, Mission Bay Campland, and Tijuana Valley Campground. The driving distance for residents within the region would increase under this alternative, from increased distance to other facilities providing low-cost visitor guest accommodations, resulting in an increase in regional VMT compared to the proposed project. Therefore, the PEIR concluded that the Wetlands Optimized Alternative would result in an increase in regional VMT compared to the proposed project.

O23-19: This comment disagrees with the PEIR conclusion that the Wetlands Optimized Alternative does not meet the project objectives. PEIR Chapter 8.0, Alternatives, provides an analysis of the Wetlands Optimized Alternative at an equal level of detail with the proposed project in accordance with the City's awarded Supplemental Environmental Project (SEP) grant. The Wetlands Optimized Alternative would increase the acres of wetlands and associated transitional zones and uplands to be created and restored in Northeastern Mission Bay, converting the southern portion of the De Anza "boot" and open water areas of De Anza Cove to wetlands. The Wetlands Optimized Alternative would maximize implementable wetland restoration generally reflective of existing feasibility

studies for Mission Bay and would provide diverse beneficial uses, such as active recreation, regional parklands, open beach, low-cost visitor guest accommodations, boat facilities/clubhouse, uplands, multi-use paths, wetlands, and an Interpretive Nature Center. Section 8.3.2.3, Relationship to Project Objectives, of the PEIR concluded that the Wetlands Optimized Alternative would not meet project objectives 1 and 6 because, compared to the proposed project, it would not as fully provide equitable access or enhance the public access of De Anza Cove. The Wetlands Optimized Alternative would convert the southern portion of the developed De Anza "boot" and the De Anza Cove open water areas to wetlands. This would result in a reduction in low-cost visitor guest accommodations and open beach uses. Furthermore, the Wetlands Optimized Alternative would not fully implement project objective 5, as active and passive recreational uses would be further reduced, therefore also reducing the customer base and opportunities for passive and active recreation, compared to the proposed project.

O23-20: This comment states that neither the Enhanced Wetlands/Optimized Parkland Alternative nor Resiliency Optimized Alternative appear to meet the (current) project objectives. As discussed in PEIR Chapter 8.0 Alternatives, the Enhanced Wetlands/Optimized Parkland Alternative, would foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2). In addition, the alternative proposes expanded wetland restoration that would provide an opportunity to increase climate change resiliency from sea level rise impacts (project objective 3). Wetlands provide erosion control and

shoreline protection from flooding. The Enhanced Wetlands/Optimized Parkland Alternative would further embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats within De Anza Cove (project objective 4). In addition, the Enhanced Wetlands/Optimized Parkland would enhance public access and connectivity within De Anza Cove and increase connections to the surrounding communities through the inclusion of the multi-use path which would allow for pedestrians and cyclists to connect with points west, north and east (project objective 6). However, the Enhanced Wetlands/Optimized Parkland Alternative, would not fully implement project objectives 1 and 5 as it would not fully provide equitable access to De Anza Cove nor fully diversify active and passive recreational uses because this alternative would reduce the amount of low-cost guest visitor accommodations, open beach, active recreation and regional recreation opportunities compared to the proposed project. In addition, the Resiliency Optimized Alternative would foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2). In addition, the expanded wetland restoration provides an opportunity to increase climate change resiliency from sea level rise impacts (project objective 3). Wetlands provide erosion control and shoreline protection from flooding. Wetlands are also dynamic habitats that are resilient to changes in freshwater flows and would be designed to be adaptable to sea level rise through augmentation, accommodation, vertical accretion, or other habitat management strategies. The Resiliency Optimized Alternative would include additional upland habitat areas that provide resiliency to changes in freshwater flows from

altered stormwater regimes. The Resiliency Optimized Alternative would further embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats within De Anza Cove (project objective 4). In addition, the Resiliency Optimized Alternative would enhance public access and connectivity within De Anza Cove and increase connections to the surrounding communities through the inclusion of the multi-use path which would allow for pedestrians and cyclists to connect with points west, north and east (project objective 6). However, the Resiliency Optimized Alternative would only partially meet project objectives 1 and 5 as it would not fully provide equitable access to De Anza Cove nor fully diversify active and passive recreational uses because this alternative would reduce the amount of low-cost guest visitor accommodations, open beach, active recreation and regional recreation opportunities compared to the proposed project.

O23-21: This comment reiterates earlier questions about how the No Project/No Build Alternative can be identified as the environmentally superior alternative. Please refer to response to comment O23-8.

Cc: SWIA Board

Comment Letter I1: Bill Earley, March 6, 2023

I1

I1-1: This comment requests to be removed from the distribution list. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is required.

From: [Bill Earley](#)
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] Re: Notice of Availability of a Draft Amendment and Draft PEIR for the De Anza Natural Amendment to the Mission Bay Park Master Plan - Public Notice Date March 6, 2023
Date: Monday, March 6, 2023 5:48:23 PM

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I1-1

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From: Moore, Jordan <JTMoore@sandiego.gov> on behalf of PLN_PlanningCEQA <planningceqa@sandiego.gov>
Sent: Monday, March 6, 2023 7:23:00 PM
To: PLN_PlanningCEQA <planningceqa@sandiego.gov>
Subject: Notice of Availability of a Draft Amendment and Draft PEIR for the De Anza Natural Amendment to the Mission Bay Park Master Plan - Public Notice Date March 6, 2023

NOTICE OF AVAILABILITY OF A DRAFT AMENDMENT AND DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

Please see the attached Notice of Availability of a Draft Amendment and Draft Program Environmental Impact Report for the De Anza Natural Amendment to the Mission Bay Park Master Plan, which was distributed for public review starting today, March 6, 2023.

The public review and comment period for the Draft Program Environmental Impact Report will end on **Thursday, April 20, 2023**.

Thank you,

CEQA & Environmental Policy Section
City of San Diego Planning Department



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Comment Letter I2: Richard Siegel, March 6, 2023

I2

I2-1: This comment does not address the adequacy or accuracy of the Program Environmental Impact Report for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is required.

From: [Richard Siegel](#)
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] Re: Notice of Availability of a Draft Amendment and Draft PEIR for the De Anza Natural Amendment to the Mission Bay Park Master Plan - Public Notice Date March 6, 2023
Date: Monday, March 6, 2023 8:07:33 PM

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I2-1

GO FUCK Yourself

On Mar 6, 2023 5:27 PM, PLN_PlanningCEQA <planningceqa@sandiego.gov> wrote:

NOTICE OF AVAILABILITY OF A DRAFT AMENDMENT AND DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

Please see the attached Notice of Availability of a Draft Amendment and Draft Program Environmental Impact Report for the De Anza Natural Amendment to the Mission Bay Park Master Plan, which was distributed for public review starting today, March 6, 2023.

The public review and comment period for the Draft Program Environmental Impact Report will end on **Thursday, April 20, 2023**.

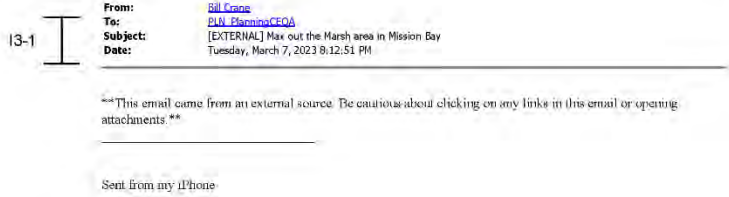
Thank you.

CEQA & Environmental Policy Section
City of San Diego Planning Department



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Comment Letter I3: Bill Crane, March 7, 2023



I3

I3-1: This comment requests that the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) max out the marsh area in Mission Bay. As discussed in Program Environmental Impact Report (PEIR) Chapter 3.0, Project Description, the project would expand the project area’s natural habitat and improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect the City of San Diego (City) against the risk of climate change in line with the City’s Climate Resilient SD Plan. The Mission Bay Park Master Plan calls for a “balanced approach” with three components: recreation, commerce, and environment. The project presents a balanced plan that proposes 225.1 acres of expanded wetland habitat and 146.5 acres of the active recreation, regional parklands, boating, open beach, and low-cost visitor guest accommodation land uses that stakeholders have requested.

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Comment Letter I4: Richard Siegel, March 7, 2023

I4

I4-1: This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

From: [RICHARD SIEGEL](#)
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] Re: Notice of Availability of a Draft Amendment and Draft PEIR for the De Anza Natural Amendment to the Mission Bay Park Master Plan - Public Notice Date March 6, 2023
Date: Tuesday, March 7, 2023 11:43:57 AM

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I4-1

STOP SPAMMING ME YOU FUCKING ASSHOLES

On Monday, March 6, 2023 at 05:28:05 PM PST, PLN_PlanningCEQA <planningceqa@sanidiego.gov> wrote:

NOTICE OF AVAILABILITY OF A DRAFT AMENDMENT AND DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

Please see the attached Notice of Availability of a Draft Amendment and Draft Program Environmental Impact Report for the De Anza Natural Amendment to the Mission Bay Park Master Plan, which was distributed for public review starting today, March 6, 2023.

The public review and comment period for the Draft Program Environmental Impact Report will end on **Thursday, April 20, 2023**.

Thank you,

CEQA & Environmental Policy Section
City of San Diego Planning Department



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Comment Letter I5: James Zamel, March 7, 2023

15

From: James Zamel
To: P.U. Planning/CEQA
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Tuesday, March 7, 2023 1:27:32 PM

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Dear City of San Diego Planners

15-1 I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

15-2 For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

15-3 For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

15-4 1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.

15-5 2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.

15-6 3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
 James Zamel

15-1: This comment discusses the preference for a project alternative that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today. Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) identifies a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. Chapter 8.0 evaluates four alternatives that were selected for additional analysis; in addition, Chapter 8.0 identifies the ReWild Mission Bay "Wild," "Wilder," and "Wildest" alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative that were considered but rejected for their failure to meet the project objectives. The rationale for eliminating each alternative is provided in Chapter 8.0. The Campland-Provided Plan Alternative that was considered but rejected would preserve the current number of camping facilities by relocating Campland on the Bay (Campland) to the other side of Rose Creek. Therefore, the PEIR did consider an alternative that meets the commenter's request. No revisions to the PEIR are warranted.

15-2: This comment states that the project would reduce RV and campsites and recreational opportunities and amenities. This comment does not address the adequacy or accuracy of the PEIR.

As discussed in PEIR Chapter 3.0, Project Description, the proposed habitat area improvements included in the project would involve the conversion of the existing Campland property to natural habitat area, as anticipated in the Mission Bay Park Master Plan. The project would replace much of the low-cost visitor guest accommodations currently offered by Campland and the Mission Bay RV Resort by offering 48.5 acres of new low-cost visitor guest accommodations, which would include land use for RVs, cabins, or other eco-friendly accommodations. No design is currently proposed; therefore, the exact number of RV and tent campsites to be provided is unknown at this time. Future projects will be subject to the City of San Diego's General Development Plan (GDP) process. A GDP, as defined in City Council Policy 600-33, is a Conceptual Master Plan that identifies the specific activities and amenities to be included within a park. As described in Section 1.2.2, Purpose and Intended Use of the PEIR, GDPs will be developed over time and will provide precise engineering and construction plans for the recreational elements of the proposed project.

The project also proposes active and passive recreational amenities to include but not be limited to sand volleyball, pickleball, tennis, walking, cycling, athletic fields, and inline/roller skating and a sandy beach area at the northern and western edges of De Anza Cove. The project includes a multi-use path that would connect the project area to points to the north, west, and east to enhance public equitable access and increase connections to the surrounding communities, and would improve access to the park areas

along the bay shoreline for residents and visitors. No revisions to the PEIR are warranted.

- I5-3:** The commenter provides their recommendation for an alternative that would result in no net loss of campsites. Please refer to response to comment I5-1, which states that the PEIR evaluates a reasonable range of alternatives. Although an overall reduction in acreage for guest accommodations would occur, the project would replace the existing campsites with the low-cost visitor guest accommodations land use, including allocating approximately 48.5 acres for RVs, cabins, or other eco-friendly accommodations. No design is currently proposed; therefore, the exact number of campsites to be provided is unknown at this time. Future projects will be subject to the City of San Diego's General Development Plan (GDP) process as described above.
- I5-4:** The comment recommends an alternative that preserves waterfront RV and tent camping access. Please refer to responses to comments I5-1 and I5-2 regarding project alternatives and project amenities. As shown on PEIR Figure 3-1, Site Plan, proposed low-cost visitor guest accommodations would be situated along the open water and beach areas of De Anza Cove and would provide users access to the shores of De Anza Cove and Mission Bay.
- I5-5:** The comment recommends an alternative that retains existing amenities. Please refer to response to comment I5-1, which states that the PEIR evaluates a reasonable range of alternatives. The project would include both active and passive recreational facilities—some of which would be similar to those that currently exist in the Campland and

Mission Bay RV Resort areas. No design is currently proposed; therefore, the exact amenities to be provided are unknown at this time. Future projects will be subject to the City of San Diego's General Development Plan process as described above.

- I5-6:** This comment requests the study of an additional alternative at the same level of detail as the project. Please refer to response to comment I5-1, which states that the PEIR evaluates a reasonable range of alternatives.

Comment Letter I6: Gener Abdon, March 8, 2023

I6

From: [Gener Abdon](#)
To: [B.N. Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan PEIR
Date: Wednesday, March 8, 2023 4:03:15 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello,

I hope to see hard science on:

- 16-1 • How restored wetlands will offer sea level rise resiliency along our bayfront for public assets like playgrounds, ballfields and picnic benches.
- 16-2 • Hydrologic modeling results that show how the city's De Anza Natural plan meets the guidelines set out in the [1994 Mission Bay Park Master Plan Update](#) that first called for restored wetlands in northeast Mission Bay, and the [Regional Water Quality Control Board's](#) SEP funding requirements that water quality improvement be a "foremost" consideration.
- 16-3 • A cost-benefit analysis of the [economic value of natural carbon sequestration](#).
- 16-4 • How sea level rise will alter habitats for threatened and endangered species barely able to sustain a toehold in current conditions.
- 16-5 • What long-term maintenance and budget requirements may be needed to keep newly-planned shorelines, beaches, waterways and recreational areas intact in the face of rising sea levels, and what will be the environmental impact of that maintenance over time.

We need Wildest-level restored acreage:

16-6 The Wildest plan demonstrates that 315 acres of habitat restoration is feasible, and the northeast corner of Mission Bay is the best place in the bay to maximize the benefits of a restored wetland. The city needs to demonstrate how 315 acres of mudflats to upland habitat will be restored.

Thank you!
 Gener from ReWild Coalition

16-1: This comment requests to see the science on how restored wetland will offer sea level resiliency along the bayfront. A Sea Level Rise Assessment Technical Report has been prepared and is incorporated into the Final Program Environmental Impact Report for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) as Appendix N. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

16-2: This comment requests hydrologic modeling showing how the project meets the 1994 Mission Bay Park Master Plan (MBPMP) and the Regional Water Quality Control Board's Supplemental Environmental Project funding requirements that water quality improvement be the foremost consideration.

The project objectives listed in PEIR Chapter 3.0, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Section 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the MBPMP.

- I6-3:** This comment requests a cost benefit analysis of the economic values of carbon sequestration. CEQA Guidelines, Section 15131, specifically states that “economic or social effects of a project shall not be treated as significant effects on the environment.” CEQA defines “environment” as “the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance” (California Public Resources Code, Section 21060.5). An EIR project analysis is limited to those socioeconomic issues that could result in a direct change to the physical environment. Therefore, the economic costs or benefits of the project are not required to be analyzed in the PEIR. No revisions to the PEIR are warranted.
- I6-4:** This comment asks how sea level rise will alter habitats for threatened and endangered species. Please refer to comment I6-1, which discusses the Sea Level Rise Assessment Technical Report.
- I6-5:** This comment requests the long-term maintenance and budget requirements needed for the project and what would be the environmental impact of that maintenance. Please refer to comment I6-3. No revisions to the PEIR are warranted.
- I6-6:** This comment states that the project needs the “Wildest” level of restored wetlands that demonstrates 315 acres of habitat restoration is feasible. The PEIR identifies a reasonable range of alternatives pursuant to CEQA Guidelines, Section 15126.6. PEIR Chapter 8.0 evaluates four alternatives that would reduce impacts compared to the proposed project (No Project/No Build Alternative, Wetlands Optimized Alternative, Enhanced Wetlands/Optimized

Parkland Alternative, and Resiliency Optimized Alternative). The PEIR goes above the requirements of CEQA by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b). The ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives are discussed in PEIR Section 8.2, Alternatives Considered and Eliminated.

The MBPMP calls for a “balanced approach” with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project proposes 146.5 acres of active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

The “Wild” and “Wildest” alternatives would not fully consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5) because they lack sufficient site areas for a balance of land uses, including enough site area for recreation and low-cost visitor guest accommodations, and as a result, they would also not provide enough equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access (project objective 1). The “Wilder” and “Wildest” alternatives would also fail to meet project objective 5 because they would reduce the amount of area available for

aquatic recreation uses, such as the enjoyment of open beach sand activities and boating.

Therefore, while all three of these alternatives would identify environmental uses, they would not consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5). These alternatives would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2) as the project would, and while these alternatives would provide bike and pedestrian pathways, they would not prioritize public access and connectivity to the extent that the project would or activation of the shoreline (project objective 6). The three ReWild alternatives would not enhance public access or provide equitable access to De Anza Cove because of how those plans laid out the habitat design to reduce access to the cove's shorelines compared to the project. Therefore, while these alternatives would meet project objectives 3 and 4 by incorporating climate adaptation strategies and embracing responsibility and stewardship of the environment, they would not meet most of the project objectives. Thus, they have been eliminated from further consideration. No changes to the PEIR are warranted.

Comment Letter I7: Frank Salazar, March 8, 2023

I7

From: [Frank Salazar](#)
To: [E.N. Flamingo/COA](#)
Subject: [EXTERNAL] Native Americans and De Anza Cove Restoration
Date: Wednesday, March 8, 2023 11:18:00 PM

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I7-1

As a local Indigenous Kumeyaay Native American who lives on an Indian Reservation, I think it's a great plan to assist local indigenous to have more ease of access. As a senior, I think considering the age of seniors for Indigenous Kumeyaay should be 55. I myself am 55 and considered a Senior on our reservation community and in our Indian Health Clinic Senior Group. Elders are a bit older, but are not numerous. Any considerations like those would be greatly appreciated.

Frank
Indigenous Kumeyaay

I7-1: This comment states that the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) is a great plan to assist the local Indigenous people in having more access to De Anza Cove. The City of San Diego (City) appreciates this commenter's participation in the review of the Program Environmental Impact Report (PEIR) for the project. This comment does not address the adequacy or accuracy of the PEIR, and no further response is warranted.

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Comment Letter I8: Catherine Thiemann, March 8, 2023

18

From: [Catherine Thiemann](#)
To: [PLN_Planning@COA](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan
Date: Wednesday, March 8, 2023 9:23:20 AM

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Dear friends,

As a 33 year resident on Mission Bay, I encourage the city to adopt the wildest plan for restoring wetlands in the NE corner of Mission Bay. We have a once-in-a-lifetime opportunity to create a beautiful, natural, multi-use environment that will help mitigate against the inevitable rise in sea level, while inspiring San Diegans and visitors who will be drawn to spend time in this beautiful area. The wildest option still leaves plenty of room for camping, while preserving and protecting the most fragile part of this ecosystem.

Sincerely,
Catherine Thiemann
Pacific Beach

I8-1: This comment recommends that the wildest plan for restoring wetland be adopted. The ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives are discussed in Section 8.2, Alternatives Considered and Eliminated, of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project).

The Mission Bay Park Master Plan (MBPMP) calls for a “balanced approach” with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project proposes 146.5 acres of active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

The ReWild “Wild” and “Wildest” alternatives would not fully consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5) because they lack sufficient site areas for a balance of land uses, including enough site area for recreation and low-cost visitor guest accommodations, and as a result, they would also not provide enough equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access (project objective 1). The “Wilder” and “Wildest” alternatives would also fail to meet project objective 5

I8-1

because they would reduce the amount of area available for aquatic recreation uses, such as the enjoyment of open beach sand activities and boating.

Therefore, while all three of these alternatives would identify environmental uses, they would not consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5). These alternatives would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2) as the project would, and while these alternatives would provide bike and pedestrian pathways, they would not prioritize public access and connectivity to the extent that the project would or activation of the shoreline (project objective 6). The three ReWild alternatives would not enhance public access or provide equitable access to De Anza Cove because of how those plans laid out the habitat design to reduce access to the cove's shorelines compared to the project. Therefore, while these alternatives would meet project objectives 3 and 4 by incorporating climate adaptation strategies and embracing responsibility and stewardship of the environment, they would not meet most of the project objectives. Thus, they have been eliminated from further consideration. No changes to the PEIR are warranted.

Comment Letter I9: Kristin Grunklee, March 9, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Kristin Grunklee](#)
To: [P.N. Flamingo/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Thursday, March 9, 2023 6:36:30 PM

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Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Kristin Grunklee

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Comment Letter I10: Joanne Barron, March 10, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Joanne Barron](#)
To: [PLN_FlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Friday, March 10, 2023 12:21:28 PM

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Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Joanne Barron

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Comment Letter I11: David Morrison, March 11, 2023

I11

From: [David Morrison](#)
To: [PLN_Planning@COA](#)
Subject: [EXTERNAL] Questions: De Anza Natural Plan Amendment
Date: Saturday, March 11, 2023 11:07:35 AM

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Questions:

- I11-1 1. Is the golf course going to be retained, moved, or eliminated?
- I11-2 2. I don't see parking lot(s) identified for the recreation area. Currently, there is one on the east side and the recently re-paved one on the west side.
- I11-3 3. Is there going to be a restaurant and/or hotel added? I hope not!

Thanks.

David Morrison

San Diego

I11-1: This comment asks if the golf course will be moved, retained, or eliminated. Figure 3-1, Site Plan, and Table 3-2, Proposed Land Use Acreages, of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) have been revised in the Final PEIR to ensure no net loss of active recreation use acreages, including for the area occupied by the Mission Bay Golf Course. In addition, the City of San Diego (City) will strive to plan for future facilities with design and phased development in a manner that minimizes disruption to active recreation access. Any necessary buffer zones and other land uses proposed on existing recreation facilities would be implemented after these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. The existing uses, including the Mission Bay Golf Course, form the baseline from which the PEIR evaluates the impacts of the project at the program level. Improvements to current facilities may be implemented as future projects come forward. Future projects will be subject to the City's General Development Plan process to ensure that all requirements are met before they are approved.

I11-2: This comment asks if parking lots will be provided for the recreation areas. As discussed in PEIR Chapter 3.0, Project Description, parking would be located in conjunction with the athletic areas and within the footprint of the low-cost visitor guest accommodation area. Additionally, surface parking lots accessible from North Mission Bay Drive would be provided to serve the proposed leases, athletic areas, and regional parkland areas at De Anza Cove. Parking lots associated with the active

recreation areas would be accessible from both North Mission Bay Drive and Grand Avenue. Overall, the project's parking areas and interior parking accessways will be designed during the General Development Plan process and at the time of redevelopment and implementation of project enhancements.

I11-3: This comment asks if the project includes a hotel and restaurant. As discussed in PEIR Chapter 3.0, the project would expand the project area's natural habitat and improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect the City against the risk of climate change in line with the City's Climate Resilient SD Plan. The project would enhance the existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations (recreational vehicles and other low-cost camping facilities), active and passive recreational opportunities to enhance public use of the area, and improvements to access to recreational uses. No hotel or restaurant uses are currently proposed.

Comment Letter I12: Eric Ramirez, March 11, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Eric Ramirez](#)
To: [PLN_Planning@COA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Saturday, March 11, 2023 6:24:58 AM

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Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Eric Ramirez

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Comment Letter I13: Pamela Taylor, March 11, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Pamela Taylor](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Saturday, March 11, 2023 11:56:03 PM

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Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Pamela Taylor

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Comment Letter I14: Diane Parker, March 12, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Diane Parker](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Sunday, March 12, 2023 6:43:01 PM

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Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Diane Parker

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Comment Letter I15: Neal Parker, March 13, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: Neal Parker
To: PLN Planning/CEQA
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Monday, March 13, 2023 12:31:29 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Neal Parker

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Comment Letter I16: Diane Fons, March 15, 2023

I16

From: [diane.fons](#)
To: [P.N. Flamingo/CEO](#)
Subject: [EXTERNAL] Comment on Mission Bay proposal
Date: Wednesday, March 15, 2023 10:27:39 AM

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I16-1

I tried to read the whole proposal but it was way over my head.
I would like the baseball fields to remain for the kids
I would like less, rather than more, housing for tourists on prime land that the city has tried to claw back FOR YEARS. It belongs to the residents of San Diego- not tourists.
It would be nice to have some sort of an open amphitheater to enjoy local music or theater outside.
A recent trip to Tulsa- the Gathering Space- was impressive with all that is being done with a park. There were tons of playground equipment, interactive musical instruments and science exhibits, beautiful stone work, sculptures and art, a science center, a space just to gather (with a coffee bar), skate park, tennis courts, bike path... I wish Mission Bay Park would provide something like that for our community. <https://www.gatheringplace.org/>

Thanks,
Diane Fons

I16-1: This comment provides recommendations for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), including additional recreation options. As stated in Chapter 3.0, Project Description, of the Program Environmental Impact Report (PEIR), the project would enhance the existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations (recreational vehicles and other low-cost camping facilities), active and passive recreational opportunities to enhance public use of the area, and improvements to access to recreational uses. PEIR Figure 3-1, Site Plan, and PEIR Table 3-2, Proposed Land Use Acreages, have been revised in the Final PEIR to ensure no net loss of active recreation use acreage, including for the existing baseball fields. However, as stated in PEIR Chapter 3.0, the project is an Amendment to the Mission Bay Park Master Plan. No development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. The PEIR acknowledges that the City of San Diego (City) will evaluate future detailed General Development Plans (GDPs) for future projects as they are developed. A GDP, as defined in City Council Policy 600-33, is a Conceptual Master Plan that identifies the activities and amenities to be included within a park. As described in PEIR Section 1.4.1, Type of PEIR, GDPs will be developed over time and will provide precise engineering and construction plans for the various elements of the project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR for the project. Therefore, no further response is warranted.

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Comment Letter I17: Jason Mulvania, March 15, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Jason.mulvania](#)
To: [E.N. Flamingo/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Wednesday, March 15, 2023 12:12:56 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Jason mulvania

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Comment Letter I18: Tim Fleming, March 16, 2023

I18

From: [Tim Fleming](#)
To: [E.N. Flaming/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan PEIR
Date: Thursday, March 16, 2023 10:34:31 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

I have one comment on the subject EIR: we need Wildest-level restored acreage.

The Wildest plan demonstrates that 315 acres of habitat restoration is feasible, and the northeast corner of Mission Bay is the best place in the bay to maximize the benefits of a restored wetland. The city needs to demonstrate how 315 acres of mudflats to upland habitat will be restored. The wetland value in this location cannot be replaced or relocated. This is the geographical center of this special wetland condition.

Tim Fleming
Resident

I18-1: This comment supports the “Wildest” level of restored acreage. The ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives are discussed in Section 8.2, Alternatives Considered and Eliminated, of the Program Environmental Impact Report for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project).

The Mission Bay Park Master Plan (MBPMP) calls for a “balanced approach” with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project proposes 146.5 acres of active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

The ReWild “Wild” and “Wildest” alternatives would not fully consider the range of active and passive recreation uses in the context of the MBPMP (project objective 5) because they lack sufficient site areas for a balance of land uses, including enough site area for recreation and low-cost visitor guest accommodations, and as a result, they would also not provide enough equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access (project objective 1). The “Wilder” and “Wildest” alternatives would also fail to meet project objective 5

because they would reduce the amount of area available for aquatic recreation uses, such as the enjoyment of open beach sand activities and boating.

Therefore, while all three of these alternatives would identify environmental uses, they would not consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5). These alternatives would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2) as the project would, and while these alternatives would provide bike and pedestrian pathways, they would not prioritize public access and connectivity to the extent that the project would or activation of the shoreline (project objective 6). The three ReWild alternatives would not enhance public access or provide equitable access to De Anza Cove because of how those plans laid out the habitat design to reduce access to the cove's shorelines compared to the project. Therefore, while these alternatives would meet project objectives 3 and 4 by incorporating climate adaptation strategies and embracing responsibility and stewardship of the environment, they would not meet most of the project objectives. Thus, they have been eliminated from further consideration.

Comment Letter I19: Derek Miller, March 16, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Derek Miller](#)
To: [E.N. Flamingo/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Thursday, March 16, 2023 11:57:28 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Derek Miller

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Comment Letter I20: Jarrett Laurence, March 18, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Jarrett Laurence](#)
To: [P.N. Flanning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Saturday, March 18, 2023 5:42:37 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Jarrett Laurence

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Comment Letter I21: Lesley Otto, March 19, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Lesley Otto](#)
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Sunday, March 19, 2023 11:39:40 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Lesley Otto

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Comment Letter I22: Randy Minnich, March 20, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Randy Minnich](#)
To: [E.N. Flamingo/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Monday, March 20, 2023 5:37:29 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Randy Minnich

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Comment Letter I23: Ray Bentsen, March 21, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [ray.bentsen](#)
To: [E.N. Flamingo/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Tuesday, March 21, 2023 5:36:44 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
ray bentsen

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Comment Letter I24: Stephen Fulton, March 21, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Stephen Fulton](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Tuesday, March 21, 2023 1:38:22 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

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2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Stephen Fulton

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Comment Letter I25: Franklin Mitts, March 22, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: FRANKLIN MITTS
To: [E.N. FlamingoCEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Wednesday, March 22, 2023 11:37:49 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
FRANKLIN MITTS

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Comment Letter I26: Todd Callaway, March 23, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [TODD CALLAWAY](#)
To: [E.N. Flamingo/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Thursday, March 23, 2023 11:42:48 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
TODD CALLAWAY

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Comment Letter I27: Terry Fyfe, March 23, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Terry Fyfe](#)
To: [E.N. Flamingo/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Thursday, March 23, 2023 5:39:33 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Terry Fyfe

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Comment Letter I28: Carolyn Barkow, March 24, 2023

I28

From: carobee@cox.net
To: [E.N. Planning/CEQA](#)
Subject: [EXTERNAL] DeAnza Natural Amendment to the Mission Bay Park Master Plan PEIR
Date: Friday, March 24, 2023 8:04:09 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello:

I28-1

I support prioritizing wetland restoration here, because it's the best place in the City to meet our Climate Action Goals. Wetlands clean the water for all the recreational users of the Bay. And, who doesn't want that?

I28-2

The EIR is incomplete without an analysis of the coming impacts from sea level rise.

I28-3

This is an opportunity to have a park that's ready for the coming century. San Diego needs the greatest volume of restored, wild wetland acreage now.

Thank you,
 Carolyn Barkow
 7844 Whelan Dr
 San Diego 92119

I28-1: This comment provides support for wetland restoration in the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) area. As discussed in Chapter 3.0, Project Description, of the Program Environmental Impact Report (PEIR) for the project, the project would expand the project area's natural habitat and improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect the City of San Diego (City) against the risk of climate change in line with the City's Climate Resilient SD Plan.

I28-2: This comment states that the PEIR is incomplete without a sea level rise analysis. A Sea Level Rise Assessment Technical Report has been completed and is incorporated into the Final PEIR as Appendix N. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

I28-3: This comment states that the City needs the greatest volume of restored, wild wetland acreage now. The Mission Bay Park Master Plan calls for a "balanced approach" with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor

guest accommodations. The project presents a balanced plan that proposes 225.1 acres of expanded wetland habitat and 146.5 acres of the active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

Comment Letter I29: Tamara Cross, March 24, 2023

I29

From: [Tamara Cross](#)
To: [ELN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan PEIR
Date: Friday, March 24, 2023 4:12:19 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear CEQA Planning Committee:

I29-1 I own my home in Pacific Beach/Crown Point, which is 2 blocks from the Kendall -Frost Marsh. I walk my dogs past the Marsh everyday and am thankful for the birds, wildlife and beauty it provides me and my family. It is a very important part of why we love living in this area. I also kayak along Crown Point bay that is kept clean by these wetlands. I hope that the City will take this opportunity to protect and create more wetlands because of their important part in keeping the water clean and water levels regulated.

I29-2 We need more wetlands and this is a perfect opportunity to achieve this goal! I believe that your current EIR is incomplete without analyzing the future impacts of sea level rise that will most likely affect my home and life, as well as every other San Diegian. Please show me that it is important to you and you prioritize restoring wetlands like the Master Plan calls for!

I29-3 Thank you for your time and consideration,

Tamara Cross
4020 Kendall Street, San Diego, CA 92109

I29-1: This comment recommends that the City of San Diego (City) take this opportunity to protect and create more wetlands because of their important part in keeping the water clean. This comment will be provided to decision makers for their consideration. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is warranted.

I29-2: This comment states that the City needs more wetlands and that the PEIR is incomplete without a sea level rise analysis. The project allows for a total of 225.1 acres of expanded wetland habitat, approximately 86.8 acres of which would be located within the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve. In addition, a project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

I29-3: This comment is a conclusion comment and does not address the adequacy or accuracy of the PEIR for the project. No further response is warranted.

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Comment Letter I30: John Squillace, March 24, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [John Squillace](#)
To: [P.N. Flamingo/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Friday, March 24, 2023 5:48:07 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
John Squillace

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Comment Letter I31: Melanie McDonald, March 25, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Melanie McDonald](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Saturday, March 25, 2023 11:51:31 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Melanie McDonald

Intentionally Left Blank

Comment Letter I32: Andrew Smisek, March 25, 2023

I32

From: [Andrew Smisek](#)
To: [Sandel, Scott](#); [EUI Planning/COA](#)
Subject: [EXTERNAL] De Anza Natural Plan & Analyzed Alternatives
Date: Saturday, March 25, 2023 8:07:42 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

I32-1
I32-2
I32-3

I support prioritizing wetland restoration here; it's the best place in the City to meet our Climate Action Goals. I want more wetlands because they clean the water for all the recreational users of the Bay—we need that. The EIR is incomplete without analyzing the coming impacts from sea level rise—show us how you preserve the restored wetlands like the Master Plan calls for. We need to choose the alternative that proposes the most wetlands and other native habitat areas to best plan for climate change and future pressures on native plant and animal species. The future humans will appreciate our forethought too.

Thank you,
Andrew Smisek

I32-1: This comment requests that the City of San Diego (City) prioritize the need for maximum wetland restoration. This comment will be provided to decision makers for their consideration. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is warranted.

I32-2: This comment states that the City needs more wetlands and that the PEIR is incomplete without a sea level rise analysis. The project allows for a total of 225.1 acres of expanded wetland habitat, approximately 86.8 acres of which would be located within the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve. In addition, a project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

I32-3: This comment states that an alternative that proposes the most wetlands and other native habitat areas is necessary to best plan for climate change and future pressures on native plant and animal species. As discussed in PEIR Chapter 3.0, Project Description, the project would expand the project area's natural habitat and improve water quality through the

creation of additional wetlands while implementing nature-based solutions to protect the City against the risk of climate change in line with the City's Climate Resilient SD Plan. The Mission Bay Park Master Plan calls for a "balanced approach" with three components: recreation, commerce, and environment. The project presents a balanced plan that proposes 225.1 acres of expanded wetland habitat and 146.5 acres of the active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

Comment Letter I33: Kimberly Eastwood, March 26, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Kimberly Eastwood](#)
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Sunday, March 26, 2023 5:57:37 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Kimberly Eastwood

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Comment Letter I34: KT Martin, March 27, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [KT Martin](#)
To: [P.N. Flaming/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Monday, March 27, 2023 6:12:39 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
KT Martin

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Comment Letter I35: Tena Ritter, March 27, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Tena Ritter](#)
To: [P.N. Flamingo/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Monday, March 27, 2023 12:04:41 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Tena Ritter

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Comment Letter I36: Jonathan Bora, March 28, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Jonathan Bora](#)
To: [E.N. Flamingo/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Tuesday, March 28, 2023 12:21:29 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Jonathan Bora

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Comment Letter I37: Craig Narta, March 29, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Craig Narta](#)
To: [PLN_FlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Wednesday, March 29, 2023 6:31:38 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Craig Narta

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Comment Letter I38: Elissa Edwards, March 30, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Elissa Edwards](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Thursday, March 30, 2023 12:42:33 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Elissa Edwards

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Comment Letter I39: Maria Mullins, March 30, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Maria Mullins](#)
To: [P.N. Flanning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Thursday, March 30, 2023 6:54:36 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Maria Mullins

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Comment Letter I40: Natalie Borchardt, March 31, 2023

I40

From: [Natalie Borchardt](#)
To: [E.N. Flaming/CEO](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan PEIR
Date: Friday, March 31, 2023 8:44:39 PM

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I40-1

The EIR is incomplete without a full scientific analysis of the impacts from sea level rise — please demonstrate how the city will restore and preserve native wetlands, as called for in the 1994 Mission Bay Park master plan.

Thanks,
Natalie

Natalie Borchardt

Senior Program Manager

THE SAN DIEGO RIVER PARK FOUNDATION

Connect. Create. Conserve.

Instagram: [@sandiegoriver](#) | **Facebook:** [@sandiegoriver](#)

Thanks,
Natalie

Natalie Borchardt

Senior Program Manager

THE SAN DIEGO RIVER PARK FOUNDATION

Connect. Create. Conserve.

Instagram: [@sandiegoriver](#) | **Facebook:** [@sandiegoriver](#)

I40-1: This comment states that the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) is incomplete without a sea level rise analysis. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

Further, this comment states that the PEIR should demonstrate how the City will restore and preserve habitat consistent with the 1994 Mission Bay Park Master Plan (MBPMP). As discussed in PEIR Chapter 3.0, Project Description, the project is an Amendment to the MBPMP to update existing language in the MBPMP and to add new language and recommendations pertaining to the project area to serve local and regional recreation needs while preserving and enhancing the natural resources of the De Anza Cove area. The project would expand the project area's natural habitat and improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect the City against the risk of climate change in line with the City's Climate Resilient SD Plan. PEIR Appendix B provides an analysis of the project's consistency with the goals and objectives of the MBPMP. Specifically, the project would promote MBPMP policies that support the

expansion of open space by removing Campland on the Bay (Campland) and replacing it with a natural habitat area contiguous with the existing Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP). The project would sustain and enhance the biodiversity of the KFMR/NWP and expand natural habitat areas contiguous to this existing preserve. While important, environmental goals are not the only goals that need to be met in order to comply with the MBPMP. The MBPMP calls for a “balanced approach” with three components: recreation, commerce, and environment. The project proposes 146.5 acres of active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

Comment Letter I41: Hannah Butler, March 31, 2023

I41

From: [Hannah Butler](#)
To: [E/L Planning/CEQA](#)
Subject: [EXTERNAL] restore the wetlands
Date: Friday, March 31, 2023 8:34:44 AM

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Hello,

I41-1

As a planning commission, it is imperative that you demonstrate how sea level rise affects any plan you consider.

--
Hannah Butler

(she/they)

hannahlaurence.com

I41-1: This comment states that the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) should demonstrate how sea level rise affects the plan being considered. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario. Please see Appendix N for further details.

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Comment Letter I42: Jacquelyn Stone, March 31, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Jacquelyn Stone](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Friday, March 31, 2023 1:07:29 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Jacquelyn Stone

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Comment Letter I43: John Canzone, April 1, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [John Canzone](#)
To: [P.N. Flamingo/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Saturday, April 1, 2023 7:21:31 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

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I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
John Canzone

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Comment Letter I44: Brian, April 2, 2023

From: [John Canzone](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Saturday, April 1, 2023 7:21:31 AM

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Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

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I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
John Canzone

I44-1: This comment asks what will happen to the marina once it is turned into a wetland and where can a sailboat be stored. As discussed in Chapter 3.0, Project Description, of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), the project would include approximately 1 acre of water use for non-motorized boats at the Boat Facilities/Clubhouse, which could provide future boat storage options. The layout of the proposed boat facility could be designed during a GDP process for the greater De Anza Cove area or as a separate, more focused GDP process for the De Anza Cove boat facility. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

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Comment Letter I45: Ann Dynes, April 2, 2023

I45

From: [Dynes, Ann](#)
 To: [P.L. Planning@COA](#)
 Subject: [EXTERNAL] PEIR
 Date: Sunday, April 2, 2023 11:18:33 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

I45-1 In addition to submitting comments to the Planning Department’s notice of changes to the Mission Bay General Plan, I also submit my comments to the PEIR process in case appropriate:

I45-2 **Recreational Facilities Must be Preserved.** I urge the planners to remove the Mission Bay Golf Course (MBGC) from the project map and the revised general planning process. MBGC is separately operated (see below) parkland in Pacific Beach and is, like the adjacent sports facilities, irreplaceable. From what I can tell, MBGC and the other recreational facilities along Grand Avenue have never been considered part of Mission Bay Park and are not on reclaimed state tidelands. MBGC was not a part of the Master Plan for Mission Bay in 1994 and it does not belong in the Master Plan now; it was shown on those maps as “leased area,” and it still is. This area, adjacent as it is to the Balboa trolley station, is slated for housing densification to accommodate a growing population and there is no space for new recreational resources. To reduce the golf course and sports facilities at this location, of all places given housing demands for this area, is unconscionable. The current Master Plan process needs to eliminate these precious resources from its scope altogether.

I45-3 **MBGC is a Unique and Invaluable Resource.** MBGC is the heart and soul of golfers learning to play, being able to play into old age, and being able to afford to play. It is the home course to 8 high school teams from around the County whose kids learn to play there and practice. It has three instructors whose focus is juniors. It is home to a club of senior women golfers and other older players who can no longer play full and arduous courses like Torrey or Balboa and who do not have the resources to belong to private clubs. It is affordable: Last year, at the average price of \$9 for a medium bucket of golf balls to practice, the revenue at MBGC for practice balls was \$1,015,189, meaning that an estimated 112,799 people practiced at the driving range! Green fee revenue last year at MBGC was \$2,037,221 meaning that the average cost to play the course per player was \$21.98. That is a wonderful price for a playable course for average golfers and without anything comparable throughout the City.

I45-4 Importantly, MBGC is the heart and soul of the City’s P.L.A.Y. Golf program where the City introduces golf to juniors in underserved areas through its recreation centers, using SNAG golf equipment, and then brings them to MBGC to experience

I45-1: This comment is an introduction to the comments and does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

I45-2: This comment states that the recreational facilities, including the Mission Bay Golf Course, must be preserved and should not be part of the project. In response to this comment and others, PEIR Figure 3-1, Site Plan, and PEIR Table 3-2, Proposed Land Use Acreages, have been revised in the Final PEIR to ensure no net loss of active recreation use acreages, including in the area occupied by the Mission Bay Golf Course. In addition, the City of San Diego (City) will strive to plan for future facilities with design and phased development in a manner that minimizes disruption to active recreation access. Any necessary buffer zones and other land uses proposed on existing recreation facilities would be implemented after these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. The existing uses, including the Mission Bay Golf Course, form the baseline from which the PEIR evaluates the impacts of the project at the program level. Improvements to current facilities may be implemented as future projects come forward. Future projects will be subject to the City’s General Development Plan process to ensure that all requirements are met before they are approved.

I45-4
cont.

real golf. Most youngsters do not have a rich family to introduce them to golf at a private golf club so this is the ONLY pipeline for youngsters in communities of concern to experience golf.

I45-5

Eliminating MBGC will impact City Finances. When I became a member of the Municipal Golf Committee, I learned more about the role of this course in the recreational resources of the City of San Diego. MBGC is an asset of the Golf Division of the City of San Diego and, as such, it is part of a separate balance sheet with the other City-operated courses, Torrey Pines and Balboa. These courses are operated independently from the rest of the City's business in order to ensure that they are self-sustaining. MBGC is a profit center for the Golf Division with revenues of over \$2 million and paid the City of San Diego general fund \$290,619 in fiscal year 2022 (more than Tecolote pays which is a leased course from the City operated by a corporate operator). A reduction in its acreage would directly reduce the City revenues depending on acres eliminated and will sharply reduce its revenues due to reduced attractiveness to golfers like I was when I learned to play golf there 25 years ago.

I45-6

Thank you for reconsidering the scope of land involved in this project.

Ann Parode Dynes
858-750-6094
Cell 858-539-3505

- I45-3:** This comment states that Mission Bay Golf Course is a unique and invaluable resource and discusses the cost to play and revenue generated from the golf course. Please refer to response to comment I45-2 regarding revisions to the Final PEIR to ensure no net loss of active recreation use acreage. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.
- I45-4:** This comment states that Mission Bay Golf Course is the heart and soul of the City's P.L.A.Y. Golf program. Please refer to response to comment I45-2 regarding revisions to the Final PEIR to ensure no net loss of active recreation use acreage. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.
- I45-5:** This comment states that eliminating Mission Bay Golf Course will impact City finances. Please refer to response to comment I45-2 regarding revisions to the Final PEIR to ensure no net loss of active recreation use acreage. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.
- I45-6:** This is a closing comment that requests consideration of the aforementioned comments. It does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

Comment Letter I46: Calistia Griebel, April 2, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Calistia Griebel](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Sunday, April 2, 2023 1:36:58 AM

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Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Calistia Griebel

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Comment Letter I47: Murphy Rasmussen, April 2, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Murphy Rasmussen](#)
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Sunday, April 2, 2023 7:52:30 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Murphy Rasmussen

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Comment Letter I48: Leslie Dufour, April 3, 2023

I48

From: L.D.
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] comments on the De Anza Natural Plan
Date: Monday, April 3, 2023 1:29:24 PM

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I48-1

I am trying very hard to understand the different plans for the De Anza area before tomorrow's meeting at Paradise Point-April 4th.

Could you please comment tomorrow on how many acres of wetlands would be left (in 2100) under the Gateway plan vs. the Wildest Plan?

I48-2

My understanding is that the state of California has said to plan for 5.5 SLR by 2100. The Wetlands group said there will be 75 acres of wetlands left by 2100 under their plan, under that SLR scenario. The PB residents can't draw any conclusions about these plans unless we know how many acres of wetlands will be left under the Gateway Plan.:-)

Thank you,

Leslie Dufour

I48-1: This comment requests how many acres of wetlands would be left (in 2100) under the Mission Bay Gateway Plan versus the ReWild Mission Bay “Wildest” Plan. The Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) identifies a reasonable range of alternatives pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6. PEIR Chapter 8.0, Alternatives, evaluates four alternatives that would reduce impacts compared to the proposed project (No Project/No Build Alternative, Wetlands Optimized Alternative, Enhanced Wetlands/Optimized Parkland Alternative, and Resiliency Optimized Alternative). The PEIR goes above the requirements of CEQA by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b). The ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” and Mission Bay Gateway alternatives are discussed in PEIR Section 8.2, Alternatives Considered and Eliminated, and were eliminated from further consideration. A Sea Level Rise Assessment Technical Report has been prepared for the proposed project and Wetlands Optimized Alternative and is incorporated into the Final PEIR as Appendix N. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise

scenario. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

I48-2: This comment states that Pacific Beach residents cannot draw any conclusions about these plans unless they know how many acres of wetlands will be left under the Mission Bay Gateway Plan. Please refer to response comment I48-1. The proposed project is the De Anza Natural Amendment to the Mission Bay Park Master Plan. The Sea Level Rise Assessment Technical Report that has been prepared and incorporated into the Final PEIR as Appendix N includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

Comment Letter I49: Jackie Niznik, April 3, 2023

I49

From: Jackie Niznik
To: E.N. Planning/CEQA
Subject: [EXTERNAL] De Anza Plan
Date: Monday, April 3, 2023 10:18:39 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

I49-1 I am writing to say I am extremely disheartened to see the San Diego Mission Bay Boat & Ski Club removed from the De Anza Natural Plan as evidenced by the latest planning documents. I strongly urge the preservation of the San Diego Mission Bay Boat & Ski Club (the Club) in the City's plans as planning efforts such as the EIR move forward. The Club is a one-of-a-kind organization providing affordable water-related programs and recreation which have been serving our community for decades. Eliminating this Club would be doing a significant disservice to the local communities as well as the broader San Diego region and negatively affecting many groups as identified below.

I49-2 We notice the Club is mentioned for possible relocation to the South Shores area however this does not make sense as a viable option for at least three reasons: 1) the ground at that location has been documented as a dumping ground for dangerous chemicals over many years and there is no testing provided in the current plan which could evaluate it as a safe alternate home for the Club, 2) it is obvious that there are many groups vying for that location so there is no guarantee the Club will win out and 3) the cost of development of that property to duplicate the Club's facilities and allow it to continue to provide it's many programs will be significant...and without help from the City (which has not been mentioned nor provided) it will be difficult if not impossible for this small, non-profit Club to raise that amount of capital. In summary, the South Shores move is NOT a viable option.

I49-3 The San Diego Mission Bay Boat & Ski Club has operated in San Diego since 1940 and provides affordable recreation amenities for San Diego residents and visitors, inclusive of all races, ages, genders, sexual orientations or disabilities. The Club takes up only a small footprint in the greater De Anza Cove area (north of the foot bridge) and would be forced to close if the De Anza Natural plan is approved as is. While the plan touts increased opportunities for recreational enjoyment, the San Diego Mission Bay Boat & Ski Club would be removed forcing the thousands of people it serves out of the recreational programs and clinics the Club has provided them for decades. This runs counter to the 2018 Notice of Preparation and the objectives of the Mission Bay Master Plan.

I49-4 The Club prides itself on its partnerships with many organizations in San Diego including but not limited to:

- Blind Community Center of San Diego
- San Diego Center for the Blind
- Braille Institute San Diego
- Southern California Outrigger Racing Association - San Diego's Pacific Islander community
- Ikuna Koa Outrigger Paddling Club
- San Diego State's Concrete Canoe Team
- UCSD's concrete Canoe Team
- Pacific Beach Town Council
- Sailors for the Sea
- Convair Water Ski Team

I49-1: This comment states the commenter's dissatisfaction with removing the San Diego Mission Bay Boat & Ski Club (Club) from the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report for the project. Therefore, no further response is warranted.

I49-2: This comment states that Club relocation to the South Shore is not a viable option. As explained in the PEIR, California Environmental Quality Act (CEQA) Guidelines, Section 15168(a), "A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) Geographically, (2) As logical parts in the chain of contemplated actions, (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

CEQA Guidelines, Section 15146, defines the degree of specificity necessary in an EIR: "The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." Therefore, an EIR for a project such as the adoption of a Master Plan Amendment should focus on the secondary effects that can be expected to follow from the adoption or Amendment, but the EIR need not be as detailed as an EIR on

the specific construction projects that might follow. Therefore, the PEIR does not serve as a project-level environmental analysis for any specific development project, and adequate information is not available at this time to address potential future site-specific impacts of the project.

Furthermore, the PEIR acknowledges that the City will evaluate future detailed General Development Plans (GDPs) for future projects as they are developed. A GDP, as defined in City Council Policy 600-33, is a Conceptual Master Plan that identifies the specific activities and amenities to be included within a park. As described in PEIR Section 1.4.1, Type of PEIR, GDPs will be developed over time and will provide precise engineering and construction plans for the recreational elements of the project. Once the project design has been completed, prior to approval, the City will route the future project through the Public Project Assessment process, which includes the preparation of the appropriate environmental documentation in accordance with CEQA. At that time specific mitigation measures will be developed based the site-specific impacts of the proposed GDP and the mitigation strategy outlined in the PEIR. At this point, public and agency comments will be invited to address the site-specific impacts identified in the future CEQA documentation. No revisions to the PEIR are warranted.

I49-3: This comment states that the Club has operated in San Diego since 1940 and that the removal would be counter to the 2018 Notice of Preparation (NOP) and the objectives of the Mission Bay Park Master Plan (MBPMP). As discussed in PEIR Chapter 1.0, Introduction, in June 2018, the City initiated a Draft PEIR (2018 Draft PEIR) process for the MBPMP and released the NOP. Preliminary analyses were performed

based on the 2018 proposed land use plan (2018 Proposal); however, the 2018 Draft PEIR was never circulated for public review. Based on feedback on the MBPMP since the original 2018 NOP was released, the City modified the project in 2022 to fine tune the land uses and increase preservation of natural resources. An NOP was circulated for the project on January 11, 2022.

Furthermore, as discussed in PEIR Chapter 3.0, Project Description, the project would enhance existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations (RVs and other low-cost camping facilities), active and passive recreational opportunities to enhance public use of the area, and improvements to access to recreational uses. Furthermore, PEIR Chapter 3.0 states that a boat facility and shared clubhouse would be sited on the northern shore of De Anza Cove with approximately 1 acre of water use for non-motorized boats, an Interpretive Nature Center, and shared parking/service infrastructure as identified on PEIR Figure 3-1, Site Plan. The project seeks to implement the recommendations of the MBPMP. PEIR Appendix B, Land Use Consistency Tables, includes a consistency analysis and determines that the project would be consistent with the goals of the MBPMP.

I49-4: This comment summarizes the other organizations that the Club partners with and programs the Club offers. The comment further states that partners would also be forced out of the current recreational programs. The project would include approximately 1 acre of water use for non- motorized

I49-4
cont.

- United San Diego Water Ski Team
- University of San Diego Water Ski Team
- Golden State Flycasters
- US Coast Guard Auxiliary
- California Division of Boating & Waterways (DBW)

With these partnerships and others, the Club is expanding the opportunities for our regional cultural and educational programs. It aims to foster a healthy Mission Bay for all. Unfortunately, these cherished partners would also be forced out of the current recreational programs and clinics that have been provided to them and their membership for decades. I hope you will work with the San Diego Mission Bay Boat & Ski Club to garner the inclusion of our Club in the De Anza Natural Plan by designating a land use for the Club's current location in a way that will allow it to remain in its current location, be a vital part of the De Anza Natural Plan and allow the Club to continue serving the San Diego community and foster new experiences in Mission Bay.

Sincerely,
Jackie Niznik

I49-5

boats, which could accommodate programs currently offered by the Club. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

I49-5: This comment is a conclusion comment and requests the inclusion of the Club in its current location. Please refer to response to comment I49-2. The City will strive to design and phase development of future facilities in a manner that minimizes disruption to existing recreational facilities. Any necessary buffer zones and other land uses proposed on existing recreational facilities would be implemented after these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. In addition, this comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. No further response is warranted.

Comment Letter I50: Christopher Rogers, April 3, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Christopher rogers](#)
To: [PLAN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Monday, April 3, 2023 2:09:28 PM

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Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Christopher rogers

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Comment Letter I51: Kurt Carlson, April 4, 2023

I51

From: [M. Lewis](#)
To: [C.N. Planning/COA](#)
Subject: [EXTERNAL] De Anza Cove Amendment to the Mission Bay Park MP
Date: Tuesday, April 4, 2023 12:16:55 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

City Planning Department:

I51-1

The Mission Bay Golf Course (MBGC) represents almost 25% of the project area covered by the original De Anza Revitalization Plan. I write this as a voice for the many San Diego golfers who strongly support that the MBGC should not be a part of this current project and for it to remain as an 18-hole public golf course as it currently exists today.

I51-2

The MBGC should be recognized as a shining example of a facility that meets ALL the values of the Mission Bay Park master plan, and meets all of the important EIR values such as Land Use; Air Quality; Biological Resources; Energy Conservation; Greenhouse Gas Emissions; Health and Safety; Historical, Hydrology/Water Quality; Noise; Public Services and Facilities; Public Utilities; and Visual Effects and Neighborhood. More importantly, MBGC brings *great societal, environmental, and recreational benefits to our community*. It will even continue to do even better with the current dollars and improvements that have been provided by the city's golf course division which has been in planning for many years to improve its facilities and infrastructure.

Land Use

I51-3

Golf is a major recreational land use in San Diego, and MBGC has long been part of its golfing, recreation, and tourist community for *over 68 years*. It is a well-used public, 18-hole, Par 58, 2700-yard golf course operated by San Diego's Golf Division. The course is used by all types of playing customers that includes San Diego residents, tourists, visitors, children, junior high schoolers, high schoolers, seniors, disc golfers, and foot-golfers. The course also has an almost new (5-6 years) golf driving range and practice area that is shared by the same group and sometimes even those that do not even play golf. MBGC is considered an executive course or "alternative golf course" meaning that it is composed of many par threes and a few par four holes that can be played in a couple of hours. The golf industry has learned over the years that a sizable percentage of golf courses all over our region are exceedingly long and hard and that people almost have to be a PGA professional to enjoy a round of golf. "Alternative golf courses" are diverse, shorter, affordable, and more enjoyable to many of the new and future levels of golfers. MBGC is very affordable and user-friendly to the public in that you do not have to own an expensive set of clubs to play the course, pay outrageous green fees for access, and be an expert golfer to enjoy your round of golf. These types of "Alternative golf courses" are trending everywhere and on the rise throughout the country; and are being built by more municipalities because of their unique social, recreational, and revenue-generating opportunities. They are less intimidating, welcome more casual golfers, are an excellent place to network, practice and introduce new golfers to the game while providing excellent meeting and hospitality venue options.

A few examples of the rise in popularity of these alternative golf courses are Goat Hill Park in Oceanside, California, a par 65 course, has thrived based on a partnership with Linksoul and John Ashworth. Oaks North, Balboa Park, Pine Glen, Reidy Creek, and Loma Santa Fe are a few of the San Diego area short executive courses. Golf Digest is currently in the later stages of developing a list to rank the top alternative golf courses in the United States. MBGC is the perfect facility for this exciting time in golf. Limitless possibilities exist for improving, marketing, and continuing to promote the virtues of MBGC within the Mission Bay Park recreational experience.

MBGC has long served as a pipeline to the bigger public golf courses in San Diego like Torrey Pines, Balboa Park and Coronado golf courses. If you talk to any regular at these and other golf courses,

I51-1: This comment states that the Mission Bay Golf Course (MBGC) should not be part of the current proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) and that it should remain as an 18-hole public golf course as it currently exists. In response to this comment and others, Figure 3-1, Site Plan, and Table 3-2, Proposed Land Use Acreages, of the Program Environmental Impact Report (PEIR) for the project have been revised in the Final PEIR to reflect no net loss of active recreation use acreages, including for the area occupied by the MBGC. In addition, the City of San Diego (City) will strive to plan for future facilities with design and phased development in a manner that minimizes disruption to active recreation access. Any necessary buffer zones and other land uses proposed on existing recreation facilities would be implemented after these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. The existing uses, including the MBGC, form the baseline from which the PEIR evaluates the impacts of the project at the program level. Improvements to current facilities may be implemented as future projects come forward. Future projects will be subject to the City's General Development Plan process to ensure that all requirements are met before they are approved.

I51-2: This comment states that the MBGC should be recognized as a shining example of a facility that meets all the values of the Mission Bay Park Master Plan and all the important PEIR values. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of

I51-3
cont.

they will know someone (if not themselves) that first learned to golf at MBGC.

Public Services and Facilities

Golf is important in providing affordable municipal services to the public using its facilities. It is important to understand that *municipal golf reflects diversity in California*, be it thru gender, ethnic, racial, and lifestyle in addition to economic and class diversity. Municipal golf represents the playgrounds for the working and middle classes, not the privileged. MBGC offers recreation for all ages, from the youngest of children to the oldest of seniors. As the game's numbers pertain to accessible golf, the SCGA states that **22 percent of all California courses are municipal**, though it is estimated that 45 percent of all golf is played across those courses daily.

I51-4

In the fiscal year of 2021, the MBGC contributed rent payments of \$301,082 to the General Fund which would be reduced proportionately if there is a reduction in the acreage of the golf course. *The use of this area for parkland instead of the golf course would increase General Fund expenses per acre by \$15,206 per year if it were turned into general parkland.* There were over 102,000 rounds played at MBGC in the 2021 fiscal year plus thousands of users of the range, practice facilities, and footgolf.

We want to convey to you the unique role MBGC plays in affordable and accessible public golf throughout the city. *MBGC is A LOCAL TREASURE* because of its practice facilities, unique layout, and holes which enable a complete golfing experience. Its importance to younger and older golfers because of its length and walkability *cannot be ignored as a healthy recreational activity.*

I51-5

We encourage everyone to come out and see the nine hundred (900) students from twelve (12) high schools throughout the city who use MBGC as an essential part of their practice and high school competitions. We are excited that *the city is smartly investing \$12,000,000 in MBGC to upgrade the clubhouse and golf course irrigation system*, using allocated Golf Enterprise funds, to build a more up-to-date and attractive facility. *These improvements are expected to further enhance the experience and revenues of MBGC and the city by offering a variety of events perfect for your corporate cocktail hours, dinner meetings, birthday celebrations, breakout sessions, social picnics, weddings, and more.* We encourage you to come out to see the ladies club that regularly plays at MBGC every week. Many of the members of the ladies club are retirees who enjoy the relaxed layout and setup of this alternative course.

MBGC is also unique in that it is *the only night-lit course in the city* where kids can practice after school in the winter. It also provides a unique recreational experience to the citizens of San Diego by providing a robust program for footgolf and disc golf. These are additional attractive and healthy recreational alternatives for kids after school.

Air Quality; Biological Resources; Energy Conservation; Noise; Greenhouse Gas Emissions; Visual Effects and Neighborhood

It would be regrettable not to recognize the positive role that MBGC currently plays in protecting ecosystems that benefit the neighborhoods directly. *MBGC preserves open space and provides a buffer (Visual and Sound) for the Bay from existing commercial, residential, and vehicular uses.* The course's tree canopies assist in sequestering carbon and *help to minimize GHG from nearby vehicular arterials and freeways.* The minimal use of hardscape, the groves of trees, and growing turf areas help global warming by *producing oxygen and cooling/reducing record elevated temperatures within the surrounding areas.* The course also *promotes biodiversity and filters/recharges rainwater* into groundwater basins thereby protecting these same areas. The course also *protects and provides a significant habitat supportive of bird life* and may obtain certification by Audubon International as an environmentally well-planned and operated golf facility.

I51-6

Thanks to the Golf Course Superintendents Association of America (GCSAA), best management practices (BMPs) for golf courses have improved by 180 degrees and *MBGC will be using this advanced technology.* The San Diego golf division has long adopted these measures and *utilizes the BMPs to cover everything from water management to pollinators to energy use.* The irrigation systems will *utilize smart irrigation control systems, water and moisture sensors, and drought-tolerant choices for turf grasses.* Reclaimed water will also improve water usage and conservation

information provided in the PEIR, and no further response is warranted.

I51-3: This comment states that golf is a major recreational land use in San Diego and that the MBGC is a valuable asset. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

I51-4: This comment states that golf is important in providing affordable municipal services to the public using its facilities. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

I51-5: This comment summarizes the unique role the MBGC plays in affordable and accessible public golf throughout the City. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

I51-6: This comment summarizes environmental benefits of golf properties. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

I51-6
cont.

efforts when utilized. Also, more *electric and battery-operated equipment will translate into additional zero-emissions opportunities and help reduce noise and air pollution which provides a healthier work environment for wildlife, users, and the workforce.*

I51-7

Current Status and Trends

With 72 golf courses in every conceivable setting from mountains to desert to ocean, it is no wonder *Golf Digest* named *San Diego one of the Top 50 golf tourism destinations in the world.* Golf is also currently thriving in the COVID world. It provides one of the only activities that can still go forward with proper social distancing. It is expected that most of the people who started the game of golf during the peak of COVID, will remain golf enthusiasts which translates into *more people playing golf than ever.* The numbers support this. In July 2021, there was an *89% increase in year-over-year revenue at Mission Bay.* The first quarter of FY2021 year saw an increase of eight thousand (8,000) rounds of golf year over year. This was a 30% increase for the first quarter of FY2021 (July 1, 2020, was the start of the fiscal year). For the first quarter of FY2021 *Mission Bay generated \$983,000 in revenue* compared to \$632,800 in FY2020.

I51-8

So, in conclusion, all of the golfing community, asks that you please recognize the importance of MBGC to the community and maintain the eighteen-hole course in its entirety. We urge that the city of San Diego's planning department recognize the actual societal, environmental, and recreational benefits that MBGC brings to our community; and how vital it is in providing affordable and accessible public golf and recreation for the citizens of San Diego. Please use your conscience in smart planning for all, listen to San Diego community of golfers, the SCGA, USGA, the PGA/LPGA tour, and protect Mission Bay Golf Course, as per the previous park administration's vision these last 68 years.

Very Truly Yours,

Kurt Carlson

I51-7: This comment states that the MBGC is a valuable recreational and financial asset. CEQA Guidelines, Section 15131, specifically states that “economic or social effects of a project shall not be treated as significant effects on the environment.” CEQA defines “environment” as “the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance” (California Public Resources Code, Section 21060.5). An EIR project analysis is limited to those socioeconomic issues that could result in a direct change to the physical environment. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

I51-8: This is a closing comment that requests that the MBGC's importance be recognized. It does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

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Comment Letter I52: Gary Fouts and Carol Renzulli, April 4, 2023

I52

From: [Gary Fouts](#)
To: [B.N. Flamingo/CEO](#)
Subject: [EXTERNAL] Mission Bay, De Anza Cove
Date: Tuesday, April 4, 2023 6:05:37 PM

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I52-1

My wife and I were part of the original community group that looked at and made recommendations as to what the citizens that ACTUALLY LIVE THERE would like to see done with this area. It took us A YEAR OR TWO TO SORT THIS OUT. Then you, the city, threw our recommendations out of the window and TOLD US WHAT YOU WERE GOING TO DO TO OUR PARK! Now you want to do it again? Have you lost your minds? Why can't you just do what we asked, for once, without pissing all of us off?
How about doing what the neighborhood took time out of our lives to recommend and quit screwing with us? We have jobs, we do what we're told, why can't you?
Sick of your BS,
Gary Fouts and Carol Renzulli

I52-1: This comment states that previous recommendations had been provided but have not been incorporated into the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project). The commenter does not specify which recommendations were not incorporated. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report for the project, and no further response is warranted.

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Comment Letter I53: Rose Hanscom, April 4, 2023

I53

From: [Elizabeth Hanscom](#)
To: [E.N. Planning/CEQA](#)
Subject: [EXTERNAL] Rewilding Mission Bay
Date: Tuesday, April 4, 2023 12:18:35 PM

** This email came from an external source. Be cautious about clicking on any links in this email or opening attachments. **

I53-1

My family and I support the rewilding of a portion of NE Mission Bay. Rewilding will provide flood control, support nesting sites for local and migratory species, and provide recreation to residents and visitors. Thank you, Rose Hanscom.
Sent from my iPad

I53-1: This comment provides support for rewilding a portion of northeastern Mission Bay. The proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) includes habitat restoration that is anticipated to result in over 225.1 acres of restored and managed wetland habitat to provide a natural environment for recreation, mitigate for other disturbed environments, benefit wildlife, and enhance water quality. The Program Environmental Impact Report (PEIR) for the project identifies a reasonable range of alternatives pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6. PEIR Chapter 8.0, Alternatives, evaluates four alternatives that would reduce impacts compared to the proposed project (No Project/No Build Alternative, Wetlands Optimized Alternative, Enhanced Wetlands/Optimized Parkland Alternative, and Resiliency Optimized Alternative). The PEIR goes above the requirements of CEQA by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b). The ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives are discussed in PEIR Section 8.2, Alternatives Considered and Eliminated.

The Mission Bay Park Master Plan (MBPMP) calls for a “balanced approach” with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional

parklands, boating, and low-cost visitor guest accommodations. The project proposes 146.5 acres of active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

The “Wild” and “Wildest” alternatives would not fully consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5) because they lack sufficient site areas for a balance of land uses, including enough site area for recreation and low-cost visitor guest accommodations, and as a result, they would also not provide enough equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access (project objective 1). The “Wilder” and “Wildest” alternatives would also fail to meet project objective 5 because they would reduce the amount of area available for aquatic recreation uses, such as the enjoyment of open beach sand activities and boating.

Therefore, while all three of these alternatives would identify environmental uses, they would not consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5). These alternatives would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2) as the project would, and while these alternatives would provide bike and pedestrian pathways, they would not prioritize public access and connectivity to the extent that the project would or activation of the shoreline (project objective 6). The three ReWild alternatives would not enhance public access or provide equitable access to De Anza Cove because of how

those plans laid out the habitat design to reduce access to the cove's shorelines compared to the project. Therefore, while these alternatives would meet project objectives 3 and 4 by incorporating climate adaptation strategies and embracing responsibility and stewardship of the environment, they would not meet most of the project objectives. Thus, they have been eliminated from further consideration.

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Comment Letter I54: Leticia Heredia, April 4, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Leticia Heredia](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Tuesday, April 4, 2023 8:27:30 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Leticia Heredia

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Comment Letter I55: Judith Nocolaidis, April 4, 2023

I55

From: [jnocolaidis](#)
To: [P.N. Planning/COA](#)
Subject: [EXTERNAL] Proposed "rewilding" of Mission Bay
Date: Tuesday, April 4, 2023 1:46:32 PM

** This email came from an external source. Be cautious about clicking on any links in this email or opening attachments. **

Hello,

While it is clearly the case that the development of Mission Bay was a strong economic boost to our city, it has rarely been acknowledged that we lost a treasure in the process. Much of the Bay was considered a "swamp" instead of an area of natural wealth in need of protection. Now we have extensive scientific studies showing that having more nature close at hand is highly beneficial to human physical and mental health and that these benefits will be economic ones for our area as well. Look at the global reputation and success of the deeply science based San Diego Zoo and Safari Park!

So I want to express my strong support of the strongest re-wild proposal for the restoration of the northeast corner of Mission Bay. The city needs to present a plan that utilizes hard science, including studies of future sea level rise and benefits of carbon sequestration to our environment. We need to restore the maximum wetland acreage at the "wildest" level and we need to do it now! Please don't accept a weakened proposal to accommodate short term interests. The entire San Diego community deserves a plan with clear and open objectives determined by the strongest scientific information available.

I would appreciate a detailed response.
Thank you
Judith Nocolaidis
jnocolaidis@cox.net

I55-1

I55-1: This comment supports the strongest ReWild proposal for the restoration of the northeastern corner of Mission Bay. The proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) includes habitat restoration that is anticipated to result in over 225.1 acres of restored and managed wetland habitat to provide a natural environment for recreation, mitigate for other disturbed environments, benefit wildlife, and enhance water quality. The Program Environmental Impact Report (PEIR) for the project identifies a reasonable range of alternatives pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6. PEIR Chapter 8.0, Alternatives, evaluates four alternatives that would reduce impacts compared to the proposed project (No Project/No Build Alternative, Wetlands Optimized Alternative, Enhanced Wetlands/Optimized Parkland Alternative, and Resiliency Optimized Alternative). The PEIR goes above the requirements of CEQA by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b). The ReWild Mission Bay "Wild," "Wilder," and "Wildest" alternatives are discussed in PEIR Section 8.2, Alternatives Considered and Eliminated.

The Mission Bay Park Master Plan (MBPMP) calls for a "balanced approach" with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional

parklands, boating, and low-cost visitor guest accommodations. The project proposes 146.5 acres of active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

The "Wild" and "Wildest" alternatives would not fully consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5) because they lack sufficient site areas for a balance of land uses, including enough site area for recreation and low-cost visitor guest accommodations, and as a result, they would also not provide enough equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access (project objective 1). The "Wilder" and "Wildest" alternatives would also fail to meet project objective 5 because they would reduce the amount of area available for aquatic recreation uses, such as the enjoyment of open beach sand activities and boating.

Therefore, while all three of these alternatives would identify environmental uses, they would not consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5). These alternatives would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2) as the project would, and while these alternatives would provide bike and pedestrian pathways, they would not prioritize public access and connectivity to the extent that the project would or activation of the shoreline (project objective 6). The three ReWild alternatives would not enhance public access or provide equitable access to De Anza Cove because of how

those plans laid out the habitat design to reduce access to the cove's shorelines compared to the project. Therefore, while these alternatives would meet project objectives 3 and 4 by incorporating climate adaptation strategies and embracing responsibility and stewardship of the environment, they would not meet most of the project objectives. Thus, they have been eliminated from further consideration. In addition, a Sea Level Rise Assessment Technical Report has been prepared and is incorporated into the Final PEIR as Appendix N. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario. No further revisions to the PEIR are warranted.

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Comment Letter I56: Robert Schreiber, April 4, 2023

I56

From: Robert Schreiber <rds@west.net>
Sent: Tuesday, April 4, 2023 11:04 AM
To: PLN_PlanningCEQA
Subject: [EXTERNAL] Please protect & expand the wetlands!!

Benefits of Restoring/improving Mission Bay wetlands

I56-1
Aesthetics.
Erosion Control.
Flood Abatement
Habitat Enhancement.
Wildlife Viewing
Education
Improved Water Quality in Mission Bay.
Recharge Aquifers
Creation of a bit of nature in an area that will eventually become more urbanized.
Natural areas are wildly popular with the public.

I56-1: This comment states the benefits of restoring Mission Bay wetlands. The City of San Diego agrees that restoring wetlands will provide many benefits. The proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) includes habitat restoration that is anticipated to result in a net environmental benefit by providing over 225.1 acres of restored and managed wetland habitat. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report for the project, and no further response is warranted.

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Comment Letter I57: Nicole Weiss, April 4, 2023

I57

From: [Nicole Weiss](#)
To: [P.N. Planning@CO6](#)
Subject: [EXTERNAL] Ridiculous
Date: Tuesday, April 4, 2023 6:33:08 PM

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I57-1

I am at the meeting at Paradise Point. Speakers are unconvincing and expecting a political agreement. The audacity to take away land used for kids sports is overwhelming and arrogant.

Nicole Weiss LCSW

I57-1: This comment is opposed to removing recreation uses from the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project). In response to this comment and others, Figure 3-1, Site Plan, and Table 3-2, Proposed Land Use Acreages, of the Program Environmental Impact Report (PEIR) for the project have been revised in the Final PEIR to reflect a no net loss of active recreation use acreage, including the area occupied by sports fields. In addition, the City of San Diego (City) will strive to plan for future facilities with design and phased development in a manner that minimizes disruption to active recreation access. Any necessary buffer zones and other land uses proposed on existing recreation facilities would be implemented after these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. The existing uses, including the youth soccer and baseball fields, form the baseline from which the PEIR evaluates the impacts of the project at the program level. Improvements to current facilities may be implemented as future projects come forward. Future projects will be subject to the City's General Development Plan process to ensure that all requirements are met before they are approved.

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Comment Letter I58: Michael Carter, April 5, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Michael Carter](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Wednesday, April 5, 2023 2:46:31 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Michael Carter

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Comment Letter I59: Louis Rodolico, April 5, 2023

I59

From: [Louis Rodolico](#)
To: [PLN Planning/CEO](#)
Cc: [SD CO News](#); [De Anza](#); [tommy.hough@gmail.com](#); [CouncilMember Kent Lesz](#); [Eshert@esandiegoaudubon.com](#)
Subject: [EXTERNAL] De Anza Cove Amendment to the Mission Bay Park Master Plan
Date: Wednesday, April 5, 2023 10:10:15 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

I59-1

Dear Planning Rep:

This is an overdue correction to the overdevelopment of Mission Bay. I like that you are keeping Campland and would like to see a Hotel type operation fanning out into the marshes with small visitor cabins on piers. It would be an iconic addition to San Diego.

This is a great project and I wish you the best of luck going forward.
Louis Rodolico

<https://timesofsandiego.com/opinion/2019/01/07/opinion-let-campland-stay-at-mission-bay-with-visitor-housing-above-wetlands/>

https://issuu.com/theclairemontimes/docs/clairmont_times_january_2019 Page 5

I59-1: This comment provides support for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) and for keeping Campland on the Bay (Campland) as part of the project and suggests incorporating a hotel. As discussed in Chapter 3.0, Project Description, of the Program Environmental Impact Statement (PEIR) for the project, the project includes enhancement and restoration within the existing Kendall-Frost Marsh Reserve/Northern Wildlife Preserve and the expansion of wetlands currently occupied by Campland. The project would follow the Mission Bay Park Master Plan recommendation of replacing the existing Campland area with expanded marshland/habitat area, which would include a combination of mudflats, wetlands, and upland habitats. The project would replace much of the low-cost visitor guest accommodations currently offered by Campland and the Mission Bay RV Resort by offering 48.5 acres of new low-cost visitor guest accommodations, which would include land use for RVs, cabins, or other eco-friendly accommodations. A hotel use is not currently proposed. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

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Comment Letter I60: Debby Vos, April 5, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Debby Vos](#)
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Wednesday, April 5, 2023 9:06:31 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Debby Vos

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Comment Letter I61: James Cameron, April 6, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [James Cameron](#)
To: [E.N. Flanning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Thursday, April 6, 2023 3:27:29 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
James Cameron

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Comment Letter I62: Cleo Kelly, April 7, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Cleo Kelly](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Friday, April 7, 2023 9:49:30 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Cleo Kelly

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Comment Letter I63: John Akin, April 8, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [John Akin](#)
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Saturday, April 8, 2023 10:36:35 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
John Akin

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Comment Letter I64: Linda Fonfara, April 8, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Linda Fonfara](#)
To: [E.N. Flaming/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Saturday, April 8, 2023 4:12:47 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Linda Fonfara

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Comment Letter I65: Miriam Kimber, April 9, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Miriam Kimber](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Sunday, April 9, 2023 5:01:30 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Miriam Kimber

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Comment Letter I66: Gracie Wareham, April 10, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Gracie Wareham](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Monday, April 10, 2023 11:27:42 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

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3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Gracie Wareham

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Comment Letter I67: Marisa Hernandez, April 12, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Marisa Hernandez](#)
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Wednesday, April 12, 2023 6:51:29 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

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1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Marisa Hernandez

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Comment Letter I68: Judith Nicolaidis, April 12, 2023

I68

From: [jnicolaidis](#)
To: [Sandel, Scott](#); [EUI Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan PEIR
Date: Wednesday, April 12, 2023 1:47:21 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

I68-1 | Hello, Mr. Sandel.
I sent this letter to the Planning group about a week ago, but now I have the appropriate title in the subject line so am resending it.
Thank you,
JN

I68-2 | Hello.
While it is clearly the case that the development of Mission BAY gave a strong economic boost to our city, it has rarely been acknowledged that we lost a treasure in the process. Much of the Bay was considered a "swamp" instead of an area of natural wealth in need of protection. Now we have extensive scientific studies showing that having more nature close at hand is highly beneficial to human physical and mental health and that these benefits will be economic ones for our area as well. Look at the global reputation and success of the deeply science based San Diego Zoo and Safari Park!

So I want to express my strong support of the strongest re-wild proposal for the restoration of the northeast corner of Mission Bay. The city needs to present a plan that utilizes hard science, including studies of future sea level rise and benefits of carbon sequestration to our environment. We need to restore the maximum wetland acreage at the "wildest" level and we need to do it now! Please don't accept a weakened proposal to accommodate short term interests. The entire San Diego community deserves a plan with clear and open objectives determined by the strongest scientific information available.

I would appreciate a detailed response.
Thank you,
Judith Nicolaidis
jnicolaidis@cox.net

I68-1: This comment is an introductory comment stating that a similar comment letter was previously sent. That comment letter is comment letter I55. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is warranted.

I68-2: Please refer to response to comment I55-1 on comment letter I55.

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Comment Letter I69: Ana Porraz, April 12, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: Ana Porraz
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Wednesday, April 12, 2023 12:22:30 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Ana Porraz

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Comment Letter I70: Martin Baggott, April 13, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Martin Baggott](#)
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Thursday, April 13, 2023 1:21:31 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Martin Baggott

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Comment Letter I71: Rustom Jamadar, April 13, 2023

I71

From: [Rustom Jamadar](#)
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan PEIR.
Date: Thursday, April 13, 2023 5:58:39 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

I71-1

Dear Planning group,
The Environmental Impact Report needs to have a complete scientific analysis of the impact from sea level rise and accompanying surges that will erode and destroy our coastline.
To best mitigate the projected damage from rising sea levels and storm surges, we need to maximize the wetland restoration.

I71-2

In addition to protection against storm surges, Maximizing Wetland Restoration would also maximize carbon dioxide absorption and sequestering it. Wetlands are a natural filter and will keep the waters of Mission Bay clean, a key to attracting tourists and residents.

I71-3

Please ensure that the Plan maximizes wetland restoration and minimizes adverse environmental impact from sea level rise and storm surges.

Sincerely,
Rustom Jamadar
Resident of San Diego for the past 30 years

I71-1: This comment states that the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) needs to include a scientific analysis of the impact from sea level rise. A Sea Level Rise Assessment Technical Report has been incorporated into the Final PEIR as Appendix N. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

I71-2: This comment states that maximizing wetland restoration would increase carbon dioxide absorption and sequestration and would keep the waters of Mission Bay clean. The City of San Diego concurs with the benefits of wetland restoration. The proposed project includes habitat restoration that is anticipated to result in a net environmental benefit by providing 225.1 acres of restored and managed wetland habitat. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

I71-3: This comment is a concluding comment and reiterates the request that the project maximize wetland restoration and minimize adverse environmental impacts from sea level rise and storm surges. Please refer to responses to comments I71-1 and I71-2.

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Comment Letter I72: Sherry Dikeman, April 14, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Sherry Dikeman](#)
To: [P.N. Flamingo/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Friday, April 14, 2023 7:52:51 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Sherry Dikeman

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Comment Letter I73: Christine Dunning, April 14, 2023

I73

From: carol@dunning@aol.com
To: [P.N. Planning/CEQA](#)
Subject: [EXTERNAL] Public Comment on DeAnza Natural Amendment to Mission Bay Park Master Plan
Date: Friday, April 14, 2023 1:01:33 PM

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Re-create vs. recreate.

I73-1 We have a rare opportunity to re-create and restore a very important corner of Mission Bay, and thus help save several species from extinction right in our front yard at the same time. These animals and plants deserve for us to get it right this time.

Rather than a piecemeal approach, we need to take a much broader view going forward. San Diego County holds the sad distinction of having the most imperiled and endangered species in the nation, about 200, according to the Nature Conservancy. We need to be responsible stewards for our region, which includes Mission Bay, and not simply try and appease the most vocal of the human species. The plants and animals have no voice, but the elimination of these species eventually ends with our own extinction. Everything is connected.

I73-2 San Diego City's own Climate Implementation Plan mentions climate focused land use in Measure 3.5, as well as in Strategy 5: Resilient Infrastructure & Healthy Ecosystems. To Restore Natural Lands - salt marsh land & other associated tidal wetland & riparian habitats, etc is specified.

By implementing San Diego Audubon's "Wildest" Plan, we have the greatest chance to meet San Diego's Climate Action Goals, re-create a functioning wetlands, as well as offer all kinds of recreation to people. "Wildest" focused on science, stakeholders and community partners. Their plan addresses sea level rise, water quality improvement, and the benefits of sequestration that wetlands provide. All species benefit more from the "Wildest" plan than the DeAnza Natural Plan. Thank you.

Christie Dunning

I73-1: This comment states that the City of San Diego (City) has a rare opportunity to restore a very important corner of Mission Bay to help endangered species. The proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) includes habitat restoration that is anticipated to result in a net environmental benefit by providing 225.1 acres of restored and managed wetland habitat that is used by sensitive, threatened, and listed species, and would expand habitat for nesting, roosting, and foraging. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report for the project, and no further response is warranted.

I73-2: This comment states that the City's Climate Implementation Plan mentions climate-focused land use. The project would further the City's climate resiliency goals related to healthy ecosystems by including restoration and enhancement of wetlands, which have been identified in the City's Climate Resilient SD Plan as important habitat to mitigate flooding, improve water quality, provide important habitat, absorb wave energy, and minimize coastal erosion. The conversion of currently developed land to restored habitat would support the conservation of natural habitats facing sea level rise risk.

In addition, the comment provides support for the San Diego Audubon's "Wildest" Plan. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. PEIR Chapter 8.0 evaluates four alternatives that were selected for additional analysis. In addition, PEIR Chapter 8.0 also

identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the ReWild Mission Bay “Wildest” proposal, is provided in PEIR Chapter 8.0.

Furthermore, the Mission Bay Park Master Plan calls for a “balanced approach” with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project proposes 146.5 acres of active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

Comment Letter I74: Thomas DiCamillo, April 15, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Thomas DiCamillo](#)
To: [P.N. Flamingo/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Saturday, April 15, 2023 2:24:36 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Thomas DiCamillo

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Comment Letter I75: Vickie DiCamillo, April 15, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Vickie DiCamillo](#)
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Saturday, April 15, 2023 8:57:39 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Vickie DiCamillo

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Comment Letter I76: Gordon Froehlich, April 15, 2023

I76

From: [Gordon Froehlich](#)
To: [E.N. Planning/CEQA](#)
Subject: [EXTERNAL] Mission Bay Park Proposal
Date: Saturday, April 15, 2023 10:09:33 AM
Attachments: [Gateway proposal.docx](#)

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I76-1

Please see the attached comments regarding the proposed development of Mission Bay De Anza Cove.

Gordon Froehlich
Pacific Beach

I76-1: This comment is an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is warranted.

Mission Bay Gateway Proposal

- 176-2 It has been a long wait for the people of San Diego to finally see the De Anza Cove housing area returned to the city. As you know, new waterfront park areas like this are very rare, especially in a city environment like ours. We need to assure that we use this opportunity for the greatest benefit to our citizens.
- 176-2 Mission Bay Park has always been a great recreational source for San Diego City and the surrounding communities. With the new area now available, this is our opportunity to make it even better. Rather than reduce the waterfront recreational opportunities we should direct our efforts at improving and expanding what we have. In these busy times with our daily lives, we need recreation places where we can relax and enjoy time with our children, friends and family. Mission Bay provides that place and can be even better with the appropriate recreational planning.
- 176-3 As a community, we can surely share the new park land territory between wetlands and recreational interests. However, to sacrifice all the new and some existing waterfront for wetlands does not serve the best interest of our community. It was obvious at the April 4th community meeting that recreational uses are favored by the citizens. Of the two recent proposals, the Mission Bay Gateway Natural Plan would best fit the community's needs and interests.
- 176-4 Suggest the wetland advocates consider Fiesta Island shores as a place to expand wetlands. There is plenty of waterfront there that is not particularly good for recreation.
- Thank you for your consideration
- Gordon Froehlich
Pacific Beach

176-2: This comment states that, rather than reducing waterfront recreational opportunities, efforts should be made to improve and expand what is there. As discussed in PEIR Chapter 3.0, Project Description, the project would enhance the existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations, active and passive recreational opportunities to enhance public use of the area, and improvements to access to recreational uses.

In response to this comment and others, PEIR Figure 3-1, Site Plan, and PEIR Table 3-2, Proposed Land Use Acreages, have been revised in the Final PEIR to reflect a no net loss of active recreation use acreages. In addition, the City of San Diego (City) will strive to plan for future facilities with design and phased development in a manner that minimizes disruption to active recreation access. Any necessary buffer zones and other land uses proposed on existing recreation facilities would be implemented after these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. The existing active recreation uses form the baseline from which the PEIR evaluates the impacts of the project at the program level. Improvements to current facilities may be implemented as future projects come forward. Future projects will be subject to the City's General Development Plan process to ensure that all requirements are met before they are approved.

I76-3: This comment states that the park land can be shared between wetlands and recreational interests. As discussed in PEIR Chapter 3.0, the project would expand the project area's natural habitat and improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect the City against the risk of climate change in line with the City's Climate Resilient SD Plan. The project would enhance the existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations, active and passive recreational opportunities to enhance public use of the area, and improvements to access to recreational uses.

This comment also provides support for the Mission Bay Gateway Plan. PEIR Chapter 8.0, Alternatives, includes a reasonable range of alternatives. PEIR Chapter 8.0 evaluates four alternatives that were selected for additional analysis. In addition, PEIR Chapter 8.0 also identifies the ReWild Mission Bay "Wild," "Wilder," and "Wildest" alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the Mission Bay Gateway Plan Alternative, is provided in PEIR Chapter 8.0.

I76-4: This comment recommends that the wetland advocates consider the Fiesta Island shores as a place to expand wetlands. Fiesta Island is not within the boundaries of the project, as shown on PEIR Figure 3-1. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

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Comment Letter I77: Rosemary Ayala, April 16, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Rosemary Ayala](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Sunday, April 16, 2023 3:31:34 PM

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Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Rosemary Ayala

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Comment Letter I78: Francescd, April 16, 2023

I78

From: francescd
To: P.N. Planning/CEQA
Subject: [EXTERNAL] Rewild sad diego bay
Date: Sunday, April 16, 2023 12:12:42 PM

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I78-1

Restoring the wetlands to improve the habitat of the birds and wildlife as well as the water quality and the impacts of climate change should be a priority. I heartily favor Alt #3 Wetlands Optimized plan. Also I am against removing the red berry shrubs on the edge of the marsh. They provide protection from tidal flooding and shelter for birds. Also no fence next to the sidewalk on crown point drive overlooking the marsh.

Sent from my Galaxy

I78-1: This comment provides support for the Wetlands Optimized Alternative. Chapter 8.0, Alternatives, of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) provides an analysis of the Wetlands Optimized Alternative at an equal level of detail with the proposed project in accordance with the City of San Diego’s (City’s) awarded Supplemental Environment Project grant. The Wetlands Optimized Alternative would increase the acreages of wetlands and associated transitional zones and uplands to be created and restored in northeastern Mission Bay, converting the southern portion of the De Anza “boot” and open water areas of De Anza Cove to wetlands. The Wetlands Optimized Alternative would maximize implementable wetland restoration generally reflective of existing feasibility studies for Mission Bay and would provide diverse beneficial uses, such as active recreation, regional parklands, open beach, low-cost visitor guest accommodations, boat facilities/clubhouse, uplands, multi-use paths, wetlands, and an Interpretive Nature Center. PEIR Section 8.3.2.3, Relationship to Project Objectives, concludes that the Wetlands Optimized Alternative would not meet project objectives 1 and 6 because, compared to the proposed project, it would not as fully provide equitable access or enhance public access of De Anza Cove. The Wetlands Optimized Alternative would convert the southern portion of the developed De Anza “boot” and the De Anza Cove open water areas to wetlands. This would result in a reduction in low-cost visitor guest accommodations and open beach uses. Furthermore, the Wetlands Optimized Alternative would not fully implement project objective 5

because active and passive recreational uses would be further reduced, therefore also reducing the customer base and opportunities for passive and active recreation, compared to the project.

This comment further states opposition to the removal of the red berry shrub and the construction of a fence next to the sidewalk along Crown Point Road. The project is an Amendment to the Mission Bay Park Master Plan. No development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. As described in PEIR Section 1.4.1, Type of PEIR, General Development Plans will be developed over time and will provide precise engineering and construction plans for the recreational elements of the project. These recommendations would be more appropriate to submit for consideration during future project-level review.

Comment Letter I79: E.I. Robbins, April 16, 2023

I79

From: [Eleanora Robbins](#)
To: [E.N. Planning/CEQA](#)
Subject: [EXTERNAL] Mission Bay wetlands
Date: Sunday, April 16, 2023 10:39:46 AM

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I79-1

As a geologist and a citizen, I am hyper-focused on the fact that sea level rise is going to be a big factor in the economic health of San Diego. If I were in charge of your decision, I would press for the largest amount of wetland re-creation. A giant wetland complex will keep seawater out of nearby buildings. Once the water enters those buildings, the owners will be able to successfully sue the City because the City knew that sea level was rising.

Sincerely,
E.I. Robbins
La Mesa, CA

--
Eleanora Robbins, PhD
USGS-retired 2001
SDEU-retired 2015
619-890-3896 cell

I79-1: This comment supports the largest amount of wetland creation to combat sea level rise. The proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) includes habitat restoration that is anticipated to result in a net environmental benefit by providing 225.1 acres of restored and managed wetland habitat. The Mission Bay Park Master Plan calls for a “balanced approach” with three components: recreation, commerce, and environment. A Sea Level Rise Assessment Technical Report has been completed and incorporated into the Final Program Environmental Impact Report (PEIR) for the project as Appendix N. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR, and no further response is warranted.

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Comment Letter I80: Ann Dynes, April 17, 2023

I80

From: Ricafort, Elvira <ERicafort@sandiego.gov>
Sent: Tuesday, April 18, 2023 9:32 AM
To: Field, Andy <AField@sandiego.gov>; Merlin, Louis <LMerlin@sandiego.gov>; Tomlinson, Tom <TomlinsonT@sandiego.gov>; Dennison, Karen <KDennison@sandiego.gov>; Tully, Michael <MTully@sandiego.gov>; Chadwick, Christina <ChadwickC@sandiego.gov>; Rodrigues, Mike <MRodrigues@sandiego.gov>
Cc: Barbrick, Ryan <RBarbrick@sandiego.gov>; Sandel, Scott <SSandel@sandiego.gov>
Subject: FW: [EXTERNAL] Fwd: Here are comments which I submitted to Planning and should got to P&R

Hello to all!

Just wanted to share the attached comment from Ms. Dynes for Item 201. Ms. Dynes indicated that she submitted the attached comment to Planning already.

Thanks.

Thank you,
Elvira "Elvi" Ricafort
Senior Management Analyst
City of San Diego
Parks and Recreation Department
T (619) 533-6518
C (858) 361-9505
ericafort@sandiego.gov

From: Rick Gulley <rickgulley1@icloud.com>
Sent: Tuesday, April 18, 2023 7:32 AM
To: Ricafort, Elvira <ERicafort@sanidiego.gov>; Barbrick, Ryan <RBarbrick@sanidiego.gov>
Subject: [EXTERNAL] Fwd: Here are comments which I submitted to Planning and should got to P&R

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Elvie and Ryan: Attached please find written public comment for Thursday's meeting; De Anza information item.

Thanks,

Rick

Begin forwarded message:

From: Ann Parode Dynes <anndynes@icloud.com>
Subject: Here are comments which I submitted to Planning and should got to P&R
Date: April 17, 2023 at 5:39:22 PM PDT
To: Rick Gulley <rickgulley1@icloud.com>

Ann Parode Dynes
858-750-6094
Cell 858-539-3505

Rick Gulley
rickgulley1@icloud.com
858-922-8788

To: City of San Diego Parks and Recreation Committee

From: Ann Parode Dynes

April 13, 2023

Re: Draft De Anza Amendment to the Mission Bay Park Master Plan

180-1 As several of you know, I am the former chair of the Municipal Golf Committee for the City of San Diego and the founder and past president of the San Diego Parks Foundation. In those capacities, I have experience very relevant to the proposed reductions in parkland in the area north of De Anza Cove. I urge this Committee to oppose the damage which the City of San Diego Planning Department's proposed amendments to the De Anza Master Plan and related PEIR will do to recreational facilities in east Pacific Beach, including to a one-of-a-kind golf course. This Committee is the shepherd of City parks and recreational resources and must resist this well-intentioned but misguided development which the planning process has taken.

180-2 Pacific Beach Parklands are not Mission Bay. It appears to me that the athletic fields and the Mission Bay Golf Course (MBGC) have never been a part of the Mission Bay Master Plan and are not on reclaimed state tidelands. None of the recreational facilities were part of the last Master Plan for Mission Bay in 1994; MBGC was shown on those maps as "leased area," and it still is. This parkland appears to have been tragically included in this planning process for several years now and this Committee should take a stand against such inclusion. These recreational resources are not part of Mission Bay, they are part of City parks benefitting residents of Pacific Beach and working class golfers from all over San Diego.

180-3 Parkland is Particularly Precious at this Location. Even if City Planners can arbitrarily include independent parkland in its De Anza planning process, since it commenced doing so several years ago, there has been one major development in this area: These recreational facilities are 2.8 miles away from the recently opened Balboa Avenue trolley station at Morena Avenue! These same City Planners report that the vicinity of the trolley station is a neighborhood slated for housing densification to accommodate our growing population and encourage reduced automobile use. Along with the South Clairemont Recreation Center to the east, this Pacific Beach parkland is close to the area of the trolley station. There is no additional space for new recreational resources to support more users in these neighborhoods. To reduce the golf course and sports facilities at this location of all places, given projected housing demands for this area, is unconscionable. To reiterate, the current Master Plan process needs to eliminate these recreational facilities from its scope altogether. There can be no responsible reduction in parks in this vicinity! Wetlands are fine but not at the expense of City parks in projected high density areas.

180-4 MBGC is a Unique and Invaluable Resource. MBGC is "ground zero" for San Diego golfers learning to play the sport, being able to play into old age, and being able to afford to play. There is nothing with its assets anywhere else in the City, public or private. It has full warm-up facilities and is eighteen holes including four pars, allowing players to use every club in their bag as they learn the sport. It is the only night-lit course in San Diego. It is the home course to 8 high school teams from around the County whose kids learn to play there and practice. It has three instructors whose focus is juniors. It is home to

180-1: This comment in an introductory comment and states opposition to the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan's (project's) reduction in recreational facilities in eastern Pacific Beach, including the Mission Bay Golf Course. In response to this comment and others, Figure 3-1, Site Plan, and Table 3-2, Proposed Land Use Acreages, of the Program Environmental Impact Report (PEIR) for the project have been revised in the Final PEIR to reflect a no net loss of active recreation use acreage, including the area occupied by the Mission Bay Golf Course. In addition, the City of San Diego (City) will strive to plan for future facilities with design and phased development in a manner that minimizes disruption to active recreation access. Any necessary buffer zones and other land uses proposed on existing recreation facilities would be implemented after these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. The existing uses, including the Mission Bay Golf Course, form the baseline from which the PEIR evaluates the impacts of the project at the program level. Improvements to current facilities may be implemented as future projects come forward. Future projects will be subject to the City's General Development Plan process to ensure that all requirements are met before they are approved.

180-2: This comment states that recreational resources are not part of Mission Bay but are City parks benefitting residents of Pacific Beach and working class golfers from all over San Diego. Please refer to response to comment 180-1. This comment does not raise a significant environmental issue

180-4 cont. a club of senior women golfers and other older players who can no longer play full and arduous courses like Torrey or Balboa and who do not have the resources to belong to private clubs. It is affordable: Last year, at the average price of \$9 for a medium bucket of golf balls to practice, the revenue at MBGC for practice balls was \$1,015,189, meaning that an estimated 112,799 people practiced at the driving range! Green fee revenue last year at MBGC was \$2,037,221 meaning that the average cost to play the course per player was \$21.98. That is a wonderful price for a playable course for average golfers and without anything comparable throughout the City.

Importantly, MBGC is the heart and soul of the City's P.L.A.Y. Golf program where the City introduces golf to juniors in underserved areas through its recreation centers, using SNAG golf equipment, and then brings them to MBGC to experience real golf. Most youngsters do not have an affluent family to introduce them to golf at a private golf club so this is the ONLY pipeline for youngsters in communities of concern and elsewhere to learn to golf. It is anticipated that the proximity to the trolley station will enhance access to MBGC from such communities.

180-5 Eliminating MBGC will impact City Finances. When I became a member of the Municipal Golf Committee, I learned more about the role of this course in the recreational resources of the City. MBGC is an asset of the Golf Division of the City and, as such, it is part of a separate balance sheet with the other City-operated courses, Torrey Pines and Balboa. These courses are operated independently from the rest of the City's business in order to ensure that they are self-sustaining. MBGC is a profit center for the Golf Division with revenues as noted above; it paid the City of San Diego general fund \$290,619 in fiscal year 2022 (more than nearby Tecolote pays which is a leased course from the City operated by a corporate operator and much too difficult to play as a learner). A reduction in MBGC acreage would directly reduce the City revenues depending on acres eliminated and will sharply reduce its revenues due to reduced attractiveness to golfers like I was when I learned to play golf there 25 years ago. Finally, after probably a decade of planning, the Golf Division is currently investing about \$7 million to upgrade the MBGC irrigation and replace asbestos-closed buildings which had been closed for years. Once again MBGC will be a place to meet, celebrate and play a round of golf in just two hours instead of the full course four! Perfect for working golfers and others with limited time.

180-6 Thank you for your consideration of these comments and for your anticipated action in support of saving Pacific Beach's parkland near, but not in De Anza Cove.

regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

180-3: This comment states that the recreational facilities in the project location are precious and should not be reduced or included within the project boundaries. Please refer to response to comment 180-1 for discussion on how the project has been revised to reflect a no net loss of active recreation use acreage.

180-4: This comment states that Mission Bay Golf Course is a unique and invaluable resource and states the financial benefits of the golf course. CEQA Guidelines Section 15131 states that "economic or social effects of a project shall not be treated as significant effects on the environment." CEQA defines "environment" as "the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance" (California Public Resources Code, Section 21060.5). An EIR project analysis is limited to those socioeconomic issues that could result in a direct change to the physical environment. Therefore, the economic cost of the project is not required to be analyzed in the PEIR. No revisions to the PEIR are warranted.

180-5: This comment states that eliminating Mission Bay Golf Course will impact City finances. Please refer to responses to comments 180-1 and 180-4.

180-6: This is a closing comment that requests consideration of the aforementioned comments. It does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

Comment Letter I81: Joanna Hirst, April 17, 2023

I81

From: [Joanna Hirst](#)
To: [P.U. Planning/CEO](#)
Cc: [Joanna Hirst](#)
Subject: [EXTERNAL] Mission Bay Park
Date: Monday, April 17, 2023 12:39:23 PM

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DE ANZA NATURAL AND PEIR: COMMENTS RE ENVIRONMENTAL ISSUES.

APRIL 2023 BY JOANNA HIRST, BOARD OF DIRECTORS.

PACIFIC BEACH TENNIS CLUB.

The setbacks which De Anza Natural and the PEIR call for along Rose Creek appear to cause the loss of two of our eight tennis courts. These courts are also striped for eight pickle ball courts.

If the setbacks along Rose Creek are in fact determined to be an essential part of the ultimate GDP, we at Pacific Beach Tennis Club (PB Tennis Club) would request that the GDP identify an alternate location such that we have a contiguous total of eight lighted courts and a possible expansion to twelve courts to meet the demand caused by the loss of the 22 courts at San Diego Tennis and Racquet Club as well as the increased demand from the 9100 new dwelling units approved by the City Council near the Balboa and Tecolote Trolley stops.

Joanna Hirst
Phic.joanna@gmail.com
858-205-2708
San Diego, CA

I81-1: This comment states that the setbacks along Rose Creek appear to eliminate the Pacific Beach Tennis Club tennis courts. In response to this comment and others, Figure 3-1, Site Plan, and Table 3-2, Proposed Land Use Acreages, of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) have been revised in the Final PEIR to reflect a no net loss of active recreation use acreage. In addition, the City of San Diego (City) will strive to plan for future facilities with design and phased development in a manner that minimizes disruption to active recreation access. Any necessary buffer zones and other land uses proposed on existing recreation facilities would be implemented after these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. The existing uses, including the Pacific Beach Tennis Club, form the baseline from which the PEIR evaluates the impacts of the project at the program level. Improvements to current facilities may be implemented as future projects come forward. Future projects will be subject to the City's General Development Plan process to ensure that all requirements are met before they are approved.

I81-1

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Comment Letter I82: Debra Madden, April 17, 2023

I82

From: [mmkmadden](#)
To: [P.N. Planning/COA](#)
Subject: [EXTERNAL] DeAnza Natural Amendment to the Mission Bay Park Master Plan PEIR
Date: Monday, April 17, 2023 12:57:08 PM

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I82-1

I am very concerned that the PEIR has no assessment or detailed review of the possible impacts of sea level rise in the De Anza review. The time to consider the future sea level rise would be now, as this plan is being reviewed. Scientists at the Scripps Institute of Oceanography have previously predicted that within less than 20 years, shoreline flooding could be a weekly event. Mission Bay is predicted to be among the first low-lying areas to experience these flooding events. It makes complete sense to support the ReWild vision of maximum wetland restoration at this time.

Sincerely,

Debra Madden
858-454-2205
La Jolla, CA 92037

I82-1: This comment expresses concern that the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) does not include an assessment or detailed review of the possible impacts of sea level rise. A Sea Level Rise Assessment Technical Report has been prepared and incorporated into the Final PEIR as Appendix N. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

This comment also provides support for the ReWild vision of maximum wetland restoration. PEIR Chapter 8.0, Alternatives, evaluates four alternatives that would reduce impacts compared to the proposed project (No Project/No Build Alternative, Wetlands Optimized Alternative, Enhanced Wetlands/Optimized Parkland Alternative, and Resiliency Optimized Alternative). The PEIR goes above the requirements of the California Environmental Quality Act (CEQA) by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b). The ReWild Mission Bay "Wild," "Wilder," and "Wildest" alternatives are discussed in PEIR Section 8.2, Alternatives Considered and Eliminated.

The Mission Bay Park Master Plan calls for a "balanced approach" with three components: recreation, commerce,

and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project proposes 146.5 acres of active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

Comment Letter I83: Elizabeth Mather, April 17, 2023

I83

From: [Beth Mather](#)
To: [E.N. Planning/COA](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan PEIR
Date: Monday, April 17, 2023 7:15:18 PM

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I83-1

The 1994 Mission Bay Park Master Plan requires that water quality be a consideration. The EIR being prepared for the De Anza area must prioritize water quality. This should be done by including specific objectives in the EIR to improve water quality in a resilient, natural infrastructure.

I83-2

The City Climate Action Plan calls for 700 acres of restored tidal wetlands by 2035. Maximizing the amount of wetlands in the De Anza area will help us achieve that goal.

I83-3

Water quality and mitigation of climate change induced sea level rise are very important considerations for our future. Please let's plan ahead smartly guided by science to do what is best for the people of San Diego.

Elizabeth Mather

Sent from my iPad

I83-1: This comment states that the Program Environmental Impact Report (PEIR) should prioritize water quality. The proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) objectives listed in PEIR Chapter 3.0, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Chapter 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

I83-2: This comment states that the City of San Diego's (City's) Climate Action Plan (CAP) calls for restoration of 700 acres and that maximizing wetlands in De Anza Cove will help achieve that goal. Other restoration areas within the City's jurisdiction are being considered to meet the goals of the City's CAP. The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 225.1 acres of wetlands. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in

reaching its 2030 and 2035 target restoration acreages. No revisions to the PEIR are warranted.

I83-3: This comment states that water quality and mitigation of climate change-induced sea level rise are very important considerations for our future. Please refer to response to comment I83-1. A Sea Level Rise Assessment Technical Report has been incorporated into the Final PEIR as Appendix N. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

Comment Letter I84: Nadya Shubin, April 17, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Nadya Shubin](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Monday, April 17, 2023 10:06:31 AM

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Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Nadya Shubin

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Comment Letter I85: Lesley Tibbetts, April 17, 2023

I85

From: [Lesley](#)
To: [P.N. Planning/COA](#)
Subject: [EXTERNAL] mission bay park
Date: Monday, April 17, 2023 5:39:10 PM

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I85-1

Since climate science is finally believed we know the water is rising. I entreat you to re-wild the area to allow water to flow where it will do the most good

Lesley Tibbetts

I85-1: This comment states that the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) area should be rewilded due to sea level rise. The project would expand the project area’s natural habitat and improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect the City of San Diego (City) against the risk of climate change in line with the City’s Climate Resilient SD Plan, and allows for a total of 225.1 acres of expanded wetland habitat. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report for the project. Therefore, no further response is warranted.

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Comment Letter I86: Andrew Wiese, April 17, 2023

I86

From: [Andrew Wiese](#)
To: [B.N. Flamingo/CEQA](#)
Subject: [EXTERNAL] Mission Bay Wetland Restoration DEIR - Re-wild Mission Bay
Date: Monday, April 17, 2023 5:28:23 PM

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Dear Mr. Sandel,

Please include the following public comments as part of the Mission Bay Wetland Restoration DEIR.

- I86-1 1. The DEIR must add a project objective to clean up Mission Bay and add the project objective, "Improve the water quality of the study area and the bay through natural, resilient infrastructure."
- I86-2 2. The DEIR is missing foreseeable impacts from sea level rise--we can't choose the best land use plan without knowing how climate change will affect our park. The DEIR must study and evaluate plan proposals against this critical measure. The DEIR is insufficient otherwise.
- I86-3 3. Make progress toward the CAP. The City's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035. ReWild is the most obvious step to help meet this essential goal. Like other city projects, the DEIR must evaluate proposals against its critical Climate Action goals, including the restored tidal marsh acreage goals from that plan.
- I86-4 4. The report is deficient because it doesn't analyze recreational and cultural opportunities of connecting to a restored tidal ecosystem. This would better balance the recreational offerings in Mission Bay Regional Park to include accessible marsh boardwalk/ trails, overlook parks, natural-scenic corridors, interpretive displays, kayaking, outdoor education and habitat restoration, stewardship, public art and other recreational opportunities, which are not currently available to the public in Mission Bay. The Rewild Mission Bay proposal is the only plan that offers these critical recreational opportunities, which the city's new Parks Master Plan itself envisions (see Appendix C p 15-24). The Wildest option offers the greatest recreational value of all, including 10.5 recreational value points per acre of restored wetland habitat contiguous and visible to park trails and pathways (p. 22, 24), equivalent to 840 recreational value points for 80 acres of restored wetland! That's a huge recreational boost to SD Mission Bay Park using the measurement criteria outlined by the city Parks Master Plan. San Diegans, including underserved communities and Kumeyaay people, deserve access to a vibrant, accessible tidal marsh. The DEIR must evaluate the recreational advantages of this rare outdoor opportunity.

Thank you for your work,

Andrew Wiese
 2936 Gobat Avenue, San Diego, 92122 (University City - Rose Creek Watershed)

I86-1: This comment states that the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) should include a project objective that prioritizes improving water quality through natural resilient infrastructure. The project objectives listed in PEIR Chapter 3.0, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Chapter 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

I86-2: This comment states that the PEIR is missing details on the foreseeable impacts from sea level rise. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

I86-3: The comment states that the PEIR fails to consider the ReWild Mission Bay "Wildest" proposal in relation to the

City's Climate Action Plan (CAP) restoration goal of 700 acres of restored tidal marsh by 2035.

Pursuant to California Environmental Quality Act Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. PEIR Chapter 8.0 evaluates four alternatives that were selected for additional analysis; in addition, PEIR Chapter 8.0 also identifies the ReWild Mission Bay "Wild," "Wilder," and "Wildest" alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the ReWild Mission Bay "Wildest" proposal, is provided in PEIR Chapter 8.0.

Other restoration areas within the City's jurisdiction are being considered to meet the goals of the City's CAP. The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 225.1 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City-managed lands, prioritizing Communities of Concern. The project would assist the City in

reaching its 2030 and 2035 target restoration acreages. No revisions to the PEIR are warranted.

I86-4: This comment states that the PEIR fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. The City concurs that a restored tidal ecosystem would provide enhanced recreational opportunities. However, as stated in CEQA Statute Section 21002.1, “The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.” No revisions to the PEIR are warranted.

I86-5: This comment states that the Rewild Mission Bay proposal is the only plan that offers critical recreational opportunities. Please refer to response to comment I86-3. The Mission Bay Park Master Plan calls for a “balanced approach” with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project proposes 146.5 acres of active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

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Comment Letter I87: Dan McKirnan, April 18, 2023

I87

From: [M. Dan McKirnan](#)
To: [P.U. Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan
Date: Tuesday, April 18, 2023 7:45:55 AM
Attachments: MB Park master plan amend. MDM.docx

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Dear Ms. Heidi Vonblum and Planning Committee Staff:

I87-1

Please review the attached comment letter addressing your proposed amendment to the Mission Bay Park Master Plan.

Thank you for working on this important project for Mission Bay!

Dan McKirnan, Ph.D.
1404 Law St.
Pacific Beach, CA 92109

I87-1: This comment is an introduction to the comments and does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

April 18, 2013

Attn: Heidi Vonblum
Planning Director
City of San Diego Planning Department
9485 Aero Dr, M.S. 413
San Diego, CA 92123

Dear Planning Committee Staff:

187-2 I am writing you in response to the De Anza Natural Amendment to the Mission Bay Park Master Plan with a focus on my concerns about water quality improvements in the proposed plan. As you know this area has a history of sustaining the highest level of pollutants in the waters of Mission Bay.

187-3 As stated in the Mission Bay Park Master Plan Update, "It is broadly recognized that the Park's economic and recreational future depends on the quality of the Bay's water." Public outreach for the park plan revealed overwhelming concern for the Bay's natural environment. Of the respondents surveyed, 86.5 percent rated water quality as a critical issue, while 71.7 percent rated the preservation and enhancement of the Park's natural resources as "very important." Furthermore, more than half of the respondents favor dedicating areas of the Park for natural enhancement purposes.

It is clearly stated in the Mission Bay Park Master Plan Update that Mission Bay Park should be planned, designed, and managed for long-term environmental health which now must include sea level rise. Priorities listed in the plan included the highest water quality and sustained bio-diversity.

187-4 In reviewing your project site plan, Figure 3-1, it is particularly notable that open beach areas in De Anza Cove will not be adequately protected from pollutants arriving from Rose Creek. The island designated visitor accommodations should be reduced such that the channel connected to De Anza Cove is widened to include substantial wetlands to filter water entering De Anza. In addition, access to the island should be limited to non-motorized vehicles to prevent discharges of oil and fuels into the wetlands and swimming areas.

187-5 The Wetlands Optimized Alternative (Fig. 8-1) is most consistent with the public's overwhelming support of improved water quality and enhancement of the Park's natural environment. It also meets the Master Plans direction to manage the park for long-term environmental health as will be required as sea levels rise. The Wetland Optimized Alternative is clearly a better option than the Site Plan in Fig. 3-1.

187-6 Important deficits in your DEIR include objectives for water quality improvements, impacts of sea level rise and integration with the City's Climate Action Plan for 700 acres of restored tidal marsh.

Sincerely,

M. Dan McKirnan, Ph.D.
EHC Board of Directors
25-year resident of Pacific Beach
1404 Law St.
San Diego, CA 92109

187-2: This comment expresses concerns about the water quality improvements in the proposed project. As discussed in the PEIR, the project aims to expand the park's natural habitat and improve water quality through the creation of additional wetlands. In addition, as described in PEIR Chapter 3.0, Project Description, the project proposes water quality design features along the edges of the active recreational areas. The proposed water quality detention basins would be different sizes and would capture and treat stormwater before flowing into Mission Bay. New water quality basins would be located to treat the entire project area in accordance with local and state requirements.

The water quality detention basins would be designed with a sediment forebay, a height-appropriate embankment specific for each area of treatment, and a base to reduce sediment and erosion at the outflow. Native plants would be used to reduce sediment and total suspended solids from stormwater. Additional water quality-enhancing features would include vegetated areas bordering all development areas to further reduce stormwater contamination, including debris and sediment, from reaching Mission Bay.

In addition to water quality detention basins, the project would incorporate site-specific best management practices to enhance water quality. These best management practices would include native plants for landscaping, which would not require fertilizers to reduce the potential for added nutrients into nearby water bodies, and efficient irrigation practices to reduce nutrient runoff. The project would incorporate storm drainage signage featuring a statement

such as “NO DUMPING” or “DRAINS TO OCEAN” to discourage illegal dumping by visitors.

As a further water quality-enhancing feature, the edges of Rose Creek and along the “boot” of De Anza Cove would be revegetated with marsh, wetland, and upland native plants.

I87-3: This comment states that the Mission Bay Park Master Plan (MBPMP) declares that the Mission Bay Park should be designed and managed for long-term environmental health, which must include sea level rise, and that priorities listed in the MBPMP include the highest water quality and sustained biodiversity. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. In addition, the project would include wetlands enhancement and restoration in City-owned portions of the existing Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP), the area currently occupied by Campland on the Bay (Campland), the eastern side of Rose Creek, and the areas in De Anza Cove currently occupied by the vacated mobile home park and open water. To the west of Rose Creek, the project seeks to implement the vision of the MBPMP by removing Campland and replacing it with habitat contiguous to the existing KFMR/NWP. The adopted MBPMP states, “West and south of Rose Creek inlet, and contiguous with the NWP, an 80+/- acre wetland habitat area is proposed.” The project allows for a total of 225.1 acres of expanded wetland habitat, approximately 86.8 acres of which would be located within the KFMR/NWP. Therefore, the project meets the environmental goals of the MBPMP.

I87-4: This comment states that that open beach areas in De Anza Cove will not be adequately protected from pollutants arriving from Rose Creek and that visitor accommodations should be reduced such that the channel connected to De Anza Cove is widened to include substantial wetlands to filter water entering De Anza. Further, access to the island should be limited to non-motorized vehicles to prevent discharges of oil and fuels into the wetlands and swimming areas. As stated in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. Please refer to response to comment I87-2 for a discussion of proposed water quality features. PEIR Section 5.7, Hydrology and Water Quality, states that the project would have the potential to result in long-term operational pollutants associated with components of the project, such as guest accommodations, parking areas, and street improvements, that would introduce potential pollutants, including sediments, heavy metals, nutrients, trash and debris, oxygen-demanding substances, oil and grease, pesticides, and bacteria and viruses. Due to the project's location within and adjacent to Rose Creek and Mission Bay, the immediate pollutants of concern are those that contribute to the eutrophic conditions at the mouth of the Rose Creek inlet (nutrients) and the high coliform counts along the Mission Bay shoreline. In addition, the expansion and regrading required for wetland restoration could lead to increased erosion.

PEIR Table 5.7-1, Recommended Best Management Practices, provides a preliminary list of recommended best management practices and would be refined and

implemented as part of final project design and monitoring programs for future project activities consistent with the project in accordance with the City's Stormwater Standards Manual that requires the preparation of a Stormwater Quality Management Plan. In addition, proposed water quality detention basins would be different sizes and would capture and treat stormwater before flowing into Mission Bay. Water quality detention basins would be designed with a sediment forebay, a height-appropriate embankment specific for each area of treatment, and a base to reduce sediment and erosion at the outflow. Native plants would be used to reduce sediment and total suspended solids from stormwater. Additional water quality-enhancing features would include vegetated areas bordering all development to reduce stormwater contamination, including debris and sediment, from reaching Mission Bay. Revegetating the edges of Rose Creek and along the "boot" of De Anza Cove with marsh, wetland, and upland native plants would create another water quality-enhancing feature.

I87-5: This comment provides support for the Wetlands Optimized Alternative. PEIR Chapter 8.0, Alternatives, provides an analysis of the Wetlands Optimized Alternative at an equal level of detail with the proposed project in accordance with the City's awarded Supplemental Environment Project funding. The Wetlands Optimized Alternative would increase the acres of wetlands and associated transitional zones and uplands to be created and restored in northeastern Mission Bay, converting the southern portion of the De Anza "boot" and open water areas of De Anza Cove to wetlands. The Wetlands Optimized Alternative would maximize implementable wetland restoration generally reflective of existing feasibility studies for Mission Bay and would provide

diverse beneficial uses, such as active recreation, regional parklands, open beach, low-cost visitor guest accommodations, boat facilities/clubhouse, uplands, multi-use paths, wetlands, and an Interpretive Nature Center. PEIR Section 8.3.2.3, Relationship to Project Objectives, concluded that the Wetlands Optimized Alternative would not meet project objectives 1 and 6 because, compared to the proposed project, it would not as fully provide equitable access or enhance the public access of De Anza Cove. The Wetlands Optimized Alternative would convert the southern portion of the developed De Anza “boot” and the De Anza Cove open water areas to wetlands. This would result in a reduction in low-cost visitor guest accommodations and open beach uses. Furthermore, the Wetlands Optimized Alternative would not fully implement project objective 5, as active and passive recreational uses would be further reduced, therefore also reducing the customer base and opportunities for passive and active recreation, compared to the proposed project.

I87-6: This comment states that the PEIR is deficient in objectives for water quality improvements, sea level rise impacts, and integration with the City’s Climate Action Plan (CAP) for 700 acres of restored tidal marsh. Please refer to responses to comments I87-2 and I87-3. The project objectives listed in PEIR Chapter 3.0 include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Other restoration areas within the City’s jurisdiction are being considered to meet the goals of the City’s CAP. The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and

riparian habitat. The project proposes to enhance 225.1 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

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Comment Letter I88: Karina Ornelas, April 18, 2023

I88

From: karinaornelas28@everyactioncustom.com <karinaornelas28@everyactioncustom.com>
Sent: Tuesday, April 18, 2023 10:34 PM
To: Sandel, Scott <SSandel@sanidiego.gov>
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan

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Dear Scott Sandel,

I88-1 As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

I88-2 The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

I88-3 The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

I88-5 The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

I88-6 The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. All San Diegans, including our Kumeyaay neighbors and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

I88-7 Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Karina Ornelas
1120 W San Ysidro Blvd Apt 12 San Ysidro, CA 92173-1165

I88-1: This comment requests that the City of San Diego (City) prioritize the need for maximum wetland restoration. This comment will be provided to decision makers for their consideration. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is required.

I88-2: This comment states that the PEIR should include a project objective that prioritizes improving water quality through natural resilient infrastructure. The project objectives listed in PEIR Chapter 3.0, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Section 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

I88-3: This comment states that the PEIR is missing details on the foreseeable impacts from sea level rise. A project-specific Sea Level Rise Study has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands

Optimized Alternative can persist under a 7 foot sea level rise scenario.

- I88-4:** The comment states that the PEIR fails to consider the ReWild Mission Bay “Wildest” proposal in relation to the City’s Climate Action Plan (CAP) restoration goal of 700 acres of restored tidal marsh by 2035.

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. Chapter 8.0 evaluates four alternatives that were selected for additional analysis; in addition, Chapter 8.0 also identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the Re-Wild Mission Bay “Wildest” proposal, is provided in Chapter 8.0.

Other restoration areas within the City’s jurisdiction are being considered to meet the goals of the City’s Climate Action Plan (CAP). The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 227 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal

wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

I88-5: This comment states that the endangered Ridgway's rail and other threatened and endangered native species will lose their habitat as sea levels rise and will be lost if the rewilding process is not started now. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7 foot sea level rise scenario. The project would expand habitat areas, resulting in long-term benefits to wetland habitat; species, including the endangered Ridgway's rail; and the functions and values of the aquatic resources. No further revisions to the PEIR are warranted.

I88-6: This comment states that the PEIR fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem, and that all San Diegans will benefit from access to a vibrant tidal marsh. The City concurs that access to a restored tidal ecosystem would be a benefit to all San Diegans, including members of

local Tribal nations. However, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." No revisions to the PEIR are warranted.

I88-7: This comment concludes the comment letter by offering a thank you for consideration. This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is required.

Comment Letter I89: Earl Pagan, April 18, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: Earl Pagan
To: PLN_Planning@CEQA
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Tuesday, April 18, 2023 11:19:48 PM

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Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Earl Pagan

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Comment Letter I90: Jessica Ronquillo, April 18, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Jessica Ronquillo](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Tuesday, April 18, 2023 4:42:30 AM

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Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Jessica Ronquillo

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applicability of this requirement for the proposed project. PEIR Appendix D Table 6 states that project construction within and adjacent to suitable habitat for light-footed Ridgway's rail, California least tern, and Belding's savannah sparrow during the breeding seasons for these species would be avoided to the extent feasible. However, should construction need to occur during the breeding season, noise monitoring would be conducted, and if necessary, temporary sound walls, buffers, or other sound attenuating devices or techniques would be used in areas of concern to reduce noise-related impacts. In addition, no long-term noise generating land uses are proposed within or adjacent to the MHPA, and the final built project would result in reduced noise impacts to the MHPA long term since it would convert the existing Campland on the Bay (Campland) to marshland habitat. No revisions to the PEIR are warranted.

I91-3: This comment states that PEIR Appendix J, Noise Technical Memorandum, deflects the question of noise impacts on wildlife. PEIR Section 5.3, Biological Resources, analyzes the potential direct and indirect impacts on sensitive wildlife and concludes that the project could result in temporary construction-related and long-term operational indirect impacts to wildlife from noise and vibration. The proposed project's consistency with the MSCP SAP General Management Directives, species-specific Area Specific Management Directives (ASMD), and General Planning Policies and Design Guidelines are demonstrated in PEIR Appendix D Tables 4 and 5. In addition, because the project is located within and adjacent to the MHPA and could result in potential indirect impacts to the preserve, it would be required to demonstrate consistency with MSCP SAP Section 1.4.3, LUAGs. Consistency with the MHPA LUAGs ensures minimization of adverse edge effects from implementation

I91-3 cont. people. The analysis completely deflects the question of noise impacts on wildlife. Peak noise readings are necessary to evaluate impacts of significance on the proposals, not just conservative 24-hour average noise levels. Wildlife do not nap thru 3000 screaming teenagers or what sounds like gun shots from track meets or baseball batting cage practice with aluminum bats. Has any instantaneous noise level analysis been done on wildlife behavior during the normal days in and around the project location? How do their behaviors compare to less urban settings?

I91-4 The mouth of Tecolote Creek is a better location for wetland habitat success, as are the south end of San Diego Bay, and many other lagoons in San Diego county. The sacrifice of existing park and recreation opportunities and valuable improvements which serve hundreds of thousands of people is not warranted in order to create poor quality habitat that serves a few hundred people's interests. The idea of "optimizing" wetlands at this location is a misplaced effort.

I91-5 The PEIR Biology and Land Use sections fail to present the physical records of the acreage involved in the shifts in land and water implied in the plans. Where are the maps and surveys establishing base-line data to guide future park use refinements? Will there be enough "land" left to comply with section 55.1 of the City Charter? How can decision makers and the public, be confident the Park acreage numbers are accurate?

I91-6 The PEIR and the associated documents provided do not include all the Appendices, Tables and Figures, listed in the Table of Contents. Where are the NOP and Comments, and Response to Comments? Questions were raised a year ago during that process regarding the contemporary Social and Economic impacts of the Project which remain un-addressed - why is that? Are these documents consistent with CEQA without these documents, analysis and disclosures?

Thank you for your attention,
Paul Ross 3534 Seahorn Circle, SD, CA 92130

of the proposed project. Therefore, indirect impacts to sensitive wildlife during construction activities and operation of the proposed project are considered less than significant. No revisions to the PEIR are warranted.

I91-4: This comment states that the mouth of Tecolote Creek is a better location for wetland habitat success, as are the southern end of San Diego Bay and other lagoons. The proposed project is the De Anza Natural Amendment to the Mission Bay Park Master Plan. PEIR Chapter 2.0 establishes the analyzed project area, which is identified as the northeastern corner of Mission Bay Park. The project focuses on habitat enhancements within the boundaries of the project area as outlined in PEIR Chapter 2.0. Tecolote Creek is outside the boundary of the project area.

I91-5: This comment states that the PEIR Biological Resources and Land Use sections (PEIR Sections 5.3 and 5.1, respectively) sections fail to present the physical records of the acreage involved in the shifts in land and water implied in the plans, and requests maps and surveys establishing baseline data to guide future park use refinements. Please refer to response to comment I91-1 that discusses the environmental baseline. Specifically, PEIR Table 2-3, Wetland Vegetation Communities and Land Cover Types in the Project Area (Acres), and PEIR Table 2-4, Upland Vegetation Communities and Land Cover Types in the Project Area (Acres), provide a summary of the vegetation communities and/or land cover types that were observed in the project area. No revisions to the PEIR are warranted.

I91-6: This comment states that the PEIR and the associated documents provided do not include all the appendices, tables, and figures listed in the Table of Contents, including the NOP and comments, and response to comments. The PEIR included

all related technical studies, tables, and figures and was available for review at the City's Planning Department located at 9485 Aero Drive, San Diego, California 92123, and on the Planning Department's CEQA Policy and Review webpage (www.sandiego.gov/planning/programs/ceqa). The NOP, comment letters received during the formal NOP public comment period, and comments made during the scoping meeting were included as PEIR Appendix A. The purpose of the NOP is to solicit guidance on the scope and content of the environmental information to be included in the PEIR. No formal responses are required.

This comment further states that the social and economic impacts of the project remain unaddressed. CEQA Guidelines, Section 15131, specifically states that "economic or social effects of a project shall not be treated as significant effects on the environment." CEQA defines "environment" as "the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance" (California Public Resources Code, Section 21060.5). An EIR project analysis is limited to those socioeconomic issues that could result in a direct change to the physical environment. Therefore, the social and economic effects of the project are not required to be analyzed in the PEIR. No revisions to the PEIR are warranted.

Comment Letter I92: Louise Russell, April 18, 2023

From: [Louise Russell](#)
To: [E.N. Planning/CEQA](#)
Subject: [EXTERNAL] DeAnza Cove Comments on the draft plan
Date: Tuesday, April 18, 2023 8:10:16 AM

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I92-1

I support including the maximum for the wetlands, the Wildest. The climate crisis demands we act.

Louise Russell
District 3 San Diego

I92

I92-1: This comment provides support for the “Wildest” plan. The Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) identifies a reasonable range of alternatives pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6. PEIR Chapter 8.0, Alternatives, evaluates four alternatives that would reduce impacts compared to the proposed project (No Project/No Build Alternative, Wetlands Optimized Alternative, Enhanced Wetlands/Optimized Parkland Alternative, and Resiliency Optimized Alternative). The PEIR goes above the requirements of CEQA by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b). The ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives are discussed in PEIR Section 8.2, Alternatives Considered and Eliminated.

The Mission Bay Park Master Plan (MBPMP) calls for a “balanced approach” with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project proposes 146.5 acres of active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

The "Wild" and "Wildest" alternatives would not fully consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5) because they lack sufficient site areas for a balance of land uses, including enough site area for recreation and low-cost visitor guest accommodations, and as a result, they would also not provide enough equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access (project objective 1). The "Wilder" and "Wildest" alternatives would also fail to meet project objective 5 because they would reduce the amount of area available for aquatic recreation uses, such as the enjoyment of open beach sand activities and boating.

Therefore, while all three of these alternatives would identify environmental uses, they would not consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5). These alternatives would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2) as the project would, and while these alternatives would provide bike and pedestrian pathways, they would not prioritize public access and connectivity to the extent that the project would or activation of the shoreline (project objective 6). The three ReWild alternatives would not enhance public access or provide equitable access to De Anza Cove because of how those plans laid out the habitat design to reduce access to the cove's shorelines compared to the project. Therefore, while these alternatives would meet project objectives 3 and 4 by incorporating climate adaptation strategies and embracing responsibility and stewardship of the environment, they would not meet most of the project objectives. Thus, they have been eliminated from further consideration.

Comment Letter I93: Kasey Schultz, April 18, 2023

I93

From: [Kasey Schultz](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan PEIR
Date: Tuesday, April 18, 2023 9:35:13 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

I93-1 This proposed restoration of San Diego's natural wetlands habitat is near and dear to my heart, and I have a few comments I hope you will consider.

I93-2 In the past few years the issue of terrible Mission Bay water quality and subsequent risk to park visitors has been highlighted by on-site testing led by San Diego Surfrider and others. We have hard data showing the contamination and bacteria in Mission Bay waters. The city's draft EIR must prioritize water quality in Mission Bay by adding a specific project objective to "improve the water quality of the study area and the bay through natural, resilient infrastructure." The 1994 Mission Bay Park Master Plan demands it, and that was set out clearly almost 30 years ago.

I93-3 Second, the city's proposal doesn't look at the cultural and recreational opportunities of connecting Mission Bay Park to a restored natural ecosystem. This would better balance and expand the park's recreation. All San Diegans, including our indigenous Kumeyaay neighbors and those in underserved communities, will benefit with access to a restored vibrant tidal marsh.

I93-4 Unexpectedly, this draft Environmental Impact Report is missing details on predictable impacts from sea level rise. How can anyone determine the best plan without knowing how climate change will affect our park over time?

I93-5 And finally, the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035. The Wildest plan provides the city with the best way to achieve this goal, but the draft EIR for the De Anza Natural plan fails to evaluate its proposals against the city's own Climate Action Plan goals. We need this evaluation.

I93-6 We are so close to locking down a plan that will demonstrate to the rest of the country what San Diego truly holds dear, our precious natural resources. Let's move forward with the wildest plan that includes the maximum wetland restoration, and be a beacon of change showing that cities and nature can lift each other up.

Thank you for your time and consideration,
 Kasey Schultz

I93-1: This comment is an introduction to the comment letter and does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

I93-2: This comment states that the PEIR should include a project objective that prioritizes improving water quality through natural resilient infrastructure. The project objectives listed in PEIR Chapter 3.0, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Section 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

I93-3: This comment states that the PEIR fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem and that all San Diegans will benefit from access to a vibrant tidal marsh. The City of San Diego (City) concurs that access to a restored tidal ecosystem would be a benefit to all San Diegans, including members of local Tribal nations. However, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant

effects can be mitigated or avoided.” No revisions to the PEIR are warranted.

I93-4: This comment states that the PEIR is missing details on the foreseeable impacts from sea level rise. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

I93-5: The comment states that the PEIR fails to consider the ReWild Mission Bay “Wildest” proposal in relation to the City’s Climate Action Plan (CAP) restoration goal of 700 acres of restored tidal marsh by 2035. Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. PEIR Chapter 8.0 evaluates four alternatives that were selected for additional analysis. In addition, PEIR Chapter 8.0 also identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these

alternatives, including the ReWild Mission Bay “Wildest” proposal, is provided in PEIR Chapter 8.0.

Other restoration areas within the City’s jurisdiction are being considered to meet the goals of the City’s CAP. The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 225.1 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City’s CAP. As identified in the City’s CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City-managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreages. No revisions to the PEIR are warranted.

I93-6: This comment provides support for the “Wildest” plan. Please refer to response to comment I93-5. The MBPMP calls for a “balanced approach” with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project presents a balanced plan that proposes 225.1 acres of expanded wetland habitat and 146.5 acres of the active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

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Comment Letter I94: Love Zubiller, April 18, 2023

I94

From: [Love Zubiller](#)
To: [B.N. FlamingCEO](#)
Subject: [EXTERNAL] Revised plan for DeAnza Cove
Date: Tuesday, April 18, 2023 7:37:11 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello,

I94-1

Regarding the revised plan for DeAnza Cove -- this is a much better proposal than the last one, but there is one major problem. Primarily, the camping area divides the wetland. A contiguous wetland is much more resilient. Please put our natural resources, our resident bird and animal population, and our world as a whole above people's camping needs. Camping grounds are nice to have, but a healthy Earth is far more necessary.

Love Zubiller
San Diego resident, 92103

--
Love Zubiller
San Diego, CA
United States of America
lovelyz@gmail.com

I94-1: This comment states that the proposed camping area divides the wetland and that a contiguous wetland is much more resilient. The Mission Bay Park Master Plan calls for a “balanced approach” with three components: recreation, commerce, and environment. The De Anza Natural Amendment to the Mission Bay Park Master Plan (project) presents a balanced plan that proposes 225.1 acres of expanded wetland habitat as well as 146.5 acres of the active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested. This comment will be provided to decision makers for their consideration. No revisions to the PEIR are warranted.

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Comment Letter I95: Danett Abbott-Wicker, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: danettabbott2@everactioncustom.com on behalf of [Danett Abbott-Wicker](#)
To: [PLN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:36:53 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Danett Abbott-Wicker
101 W Riverdale Ave Unit 6 Orange, CA 92865-1053

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Comment Letter I96: Megan Abney, April 19, 2023

I96

I96-1: This comment provides support for the preservation and protection of the Bob McEvoy Youth Fields. In response to this comment and others, Figure 3-1, Site Plan, and Table 3-2, Proposed Land Use Acreages, of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) have been revised in the Final PEIR to ensure no net loss of active recreation use acreages. In addition, the City of San Diego (City) will strive to plan for future facilities with design and phased development in a manner that minimizes disruption to active recreation access. Any necessary buffer zones and other land uses proposed on existing recreation facilities would be implemented after these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. The existing uses, including the Bob McEvoy Youth Fields, form the baseline from which the PEIR evaluates the impacts of the project at the program level. Improvements to current facilities may be implemented as future projects come forward. Future projects will be subject to the City's General Development Plan process to ensure that all requirements are met before they are approved.

From: [Abney, Megan](#)
To: [Chris, Todd \(External\)](#); [Council Member Joe LaCava](#); [Council Member Jennifer Campbell](#); [Field, Andy](#); [hoffmeier@sdgs.com](#); [Tara, Tara@san-diego.gov](#); [General](#); [Bachman, Councilman](#); [Dill, Dill@sdgs.com](#); [Sara, Sara](#); [Council Member Stephen Whitburn](#); [Tara, Tara@sdgs.com](#); [Laser, Krista](#); [Rodriguez, Mike](#); [Sesler, Jim](#); [SDGP Members@san-diego.gov](#)
Subject: [EXTERNAL] Please "Save our Fields" - Bob McEvoy Youth Fields
Date: Wednesday, April 19, 2023 9:50:05 PM
Attachments: [image001.png](#)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

I96-1

Honorable Mayor, Council Members, Park Committee Board, City Staff & Civic Leaders,
 I am a constituent of Pacific Beach (4279 Lamont Street).
 I am writing to express my support for the preservation and protection of the Bob McEvoy Youth Athletic Fields. While I appreciate the need to add more wetlands and to protect our water ways and clean air, my concern is the impact on the youth fields. Pacific Beach and Mission Beach are areas of growth for young families in San Diego. Houses are turning over to young families, schools are being filled up by these young families and in return, the area is more family friendly. These fields are the only place in the central area for kids to play soccer, baseball, softball and more in a centralized location and thousands of kids across central San Diego come here to play. As we strive to offer kids outdoor opportunities (and get them away from video games!), taking away their fields would be detrimental to the health and growth of our cities youth. As you're most likely aware, the current plan will eliminate these historic youth athletic fields. There needs to be a solution that keeps the fields 100% in tact - specifically in writing. A notation of green space is unacceptable as it doesn't specifically call out and allow for the fields to be preserved. For the future of our children and the future of San Diego, we need to KEEP the Athletic Fields in conjunction with your efforts to restore marshlands. I implore you to Save our Fields!

Thank you in advance for all of your efforts to protect youth sports and to serve our "Finest City"

Sincerely,

Megan Abney
 Digital Sales Manager
mabney@tegna.com | 214-418-8282
CBS8.com | TEGNA.com | PREMION.com
 Let's Connect: [LinkedIn](#)



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Comment Letter I97: Teri Allen, April 19, 2023

This comment letter is a duplicate of comment letter I5. Please refer to comment letter I5 for responses to this comment letter.

From: [Teri Allen](#)
To: [E.N. Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Wednesday, April 19, 2023 5:57:39 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City of San Diego Planners

I am writing to ask that the City please include an alternative in its Project Environmental Impact Report (PEIR) that preserves the same amount of waterfront RV camping and recreational access within the study area that is available today.

For generations, Campland on the Bay and Mission Bay RV Resort have been beloved destinations for San Diegans and visitors alike. That is why it is concerning that the City's latest proposal significantly reduces the 838 RV and tent campsites currently available in N.E. Mission Bay today, as well as recreational opportunities and amenities, at a time when affordable coastal access is more important than ever.

For these reasons, I, along with countless others, again urge the City to include an alternative in its study that would result in:

1. NO net loss of campsites! Study a plan that maintains or increases the existing 838 campsites in Northeast Mission Bay.
2. Protected waterfront RV access! Study a plan that enhances and expands beachfront RV and tent camping sites and access where infrastructure already exists to support it.
3. Retained amenities! Study a plan that protects ALL amenities that exist at Campland today, including an amphitheater, event space, sports fields and courts, watersport and boat rentals, marina, convenience market and restaurant.

I urge you to please consider this feedback and study such an alternative at the same level as the City's De Anza Natural Plan. Thank you!

Thank you for your time,
Teri Allen

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Comment Letter I98: Kim Altana, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: kaltana@everactioncustom.com on behalf of [Kim Altana](#)
To: [PLAN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:50:54 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Kim Altana
19100 Harvard Ave Apt 24 Irvine, CA 92612-2660

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Comment Letter I99: Kenneth Althiser, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: kalthiser@evervector.com on behalf of Kenneth Althiser
To: [PLN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:06:35 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Kenneth Althiser
38920 Newberry St. Cherry Valley, CA 92223-3638

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Comment Letter I100: Marit Anderson, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: dmartyanderson@severactioncustom.com on behalf of Marit Anderson
To: [EIR_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:04:19 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Marit Anderson
444 N El Camino Real Spc 84 Encinitas, CA 92024-1312

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Comment Letter I101: Jennifer Ankele, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: Jenna777777@everactioncustom.com on behalf of [Jennifer Ankele](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:19:45 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Jennifer Ankele
4190 Highland Pl Riverside, CA 92506-1194

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Comment Letter I102: Hugh Armstrong, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: hugh4@servactioncustom.com on behalf of Hugh Armstrong
To: [PLAN_PLANNING@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:11:13 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Hugh Armstrong
26322 Paeato Dr Mission Viejo, CA 92691-4122

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Comment Letter I103: Barbara Ayers, April 19, 2023

I103

From: [Barb Ayers](#)
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] RE: DeAnza Natural Plan and the future of our non profit services
Date: Wednesday, April 19, 2023 9:33:26 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

RE: DeAnza Natural and the future of our services

I am a member of Convair Waterski Club, a not-for-profit recreational club that's been a weekly Mission Bay Park user for 65 years. Our club has taught thousands of San Diegans how to ski and operate boats safely though in depth training.

We support community events such as Blind Ski days, Kumeyaay canoe building, Mission Bay Parade of Lights and active duty military activities.

25 years ago, we moved our boats to San Diego Mission Bay Boat & Ski Club (MBBSC) in the northeast Mission Bay. Our club's future is tied to MBBSC's future; no other Mission Bay Park facilities meet our needs.

If we are forced to relocate, we may lose our club. We are a small non profit with low cost services and no capital campaign resources. Locating our boats on Mission Bay leverages volunteer boat drivers.

We regularly provide public comment to the De Anza Natural Project; however there is currently no viable option for MBBSC or Convair Waterski Club.

Please re-visit your plans to allow us to maintain a strong presence in Mission Bay Park, and deliver community services for another 65 years.

Thank you.

Barbara Ayers

Convair Waterski Club member
gorgedogmom@gmail.com

I103-1: This comment states that the Convair Waterski Club's future is tied to the Mission Bay Boat and Ski Club and that, if forced to relocate, the club may be lost. This comment further requests that the plan be revisited to allow the club to remain in Mission Bay Park. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is warranted.

I103-1

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Comment Letter I104: Earl Balch, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: balche@severactioncustom.com on behalf of Earl Balch
To: [EIR_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 5:11:54 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Earl Balch
838 San Luis Rey Pl | San Diego, CA 92109-8249

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Comment Letter I105: Beverly Ball, April 19, 2023

I105

From: beverly.ball@evergreenecosystem.com on behalf of Beverly Ball
To: [EIA Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 8:59:52 PM

** This email came from an external source. Be cautious about clicking on any links in this email or opening attachments. **

Dear CEQA Planning Department,

I105-1

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

I105-2

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

I105-3

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

I105-4

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

I105-5

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeiyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

I105-6

I particularly want to put in a word for the many children who are of an age which has not yet given them the ability to understand the impact our choices could have on them in the future, and do not yet have the voice that enables them to express their hopes and needs to you. I think that we can only feel best about our choices regarding this local environment in critical need, when we carefully consider all the children that will be involved.

I105-7

I105-8

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
 Beverly Ball
 3121 N Labarre Rd Metairie, LA 70002-5023

I105-1: This comment requests that the City of San Diego (City) prioritize the need for maximum wetland restoration. This comment will be provided to decision makers for their consideration. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is warranted.

I105-2: This comment states that the PEIR should include a project objective that prioritizes improving water quality through natural resilient infrastructure. The project objectives listed in PEIR Chapter 3, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Section 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

I105-3: This comment states that the PEIR is missing details on the foreseeable impacts from sea level rise. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for

the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

I105-4: The comment states that the PEIR fails to consider the ReWild Mission Bay “Wildest” proposal in relation to the City’s Climate Action Plan (CAP) restoration goal of 700 acres of restored tidal marsh by 2035.

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. Chapter 8.0 evaluates four alternatives that were selected for additional analysis; in addition, Chapter 8.0 also identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the Re Wild Mission Bay “Wildest” proposal, is provided in Chapter 8.0.

Other restoration areas within the City’s jurisdiction are being considered to meet the goals of the City’s Climate Action Plan (CAP). The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 227 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal

wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

I105-5: This comment states that the endangered Ridgway's rail and other threatened and endangered native species will lose their habitat as sea levels rise and will be lost if the rewilding process is not started now. A project-specific Sea Level Rise Study has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The project would expand habitat areas, resulting in long-term benefits to wetland habitat; species, including the endangered Ridgway's rail; and the functions and values of the aquatic resources. No further revisions to the PEIR are warranted.

I105-6: This comment states that the PEIR fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem, and that all San Diegans will benefit from access to a vibrant tidal marsh. The City concurs that access to a restored tidal ecosystem would be a benefit to all San Diegans, including members of local Tribal nations. However, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those

significant effects can be mitigated or avoided." No revisions to the PEIR are warranted.

I105-7: This comment states that the project should consider the children who will be involved. This comment does not address the adequacy or accuracy of the PEIR for the proposed project, and no further response is warranted.

I105-8: This comment is a conclusionary comment and requests consideration of the previous recommendations. This comment does not address the adequacy or accuracy of the PEIR for the project, and no further response is warranted.

Comment Letter I106: Graciela Barajas, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: gbarajas@everactioncustom.com on behalf of [Graciela Barajas](#)
To: [PLAN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:28:47 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Graciela Barajas
2930 Broadway Unit 52, San Diego, CA 92102-7206

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Comment Letter I107: Mimi Barress, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: mimi.barress@severactioncustom.com on behalf of Mimi Barress
To: [PLAN_PLANNING/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 2:41:38 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Mimi Barress
301 W Vermont Ave Escondido, CA 92025-6549

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Comment Letter I108: Sandra Barton, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: kanwats@everactioncustom.com on behalf of Sandra Kanela Barton
To: [Sandel, Scott](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 2:49:27 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Scott Sandel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Sandra Kanela Barton
350 E Palm Canyon Dr Apt 11 Palm Springs, CA 92264-8847

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Comment Letter I109: Elaine Barrett, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: tabbysrnm@berva-actioncustom.com on behalf of Elaine Barrett
To: [PLAN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 10:17:18 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Elaine Barrett
1020 Robison Ave Apt 8 San Diego, CA 92103-4474

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Comment Letter I110: Keiko Barrett, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: 9728920@evaryaction.com on behalf of Keiko Barrett
To: [E.N. Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:45:09 AM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Keiko Barrett
1150 J St. San Diego, CA 92101-7240

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Comment Letter I111: Corey Bassett, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: bassett.corey@beverlyaction.com on behalf of Corey Bassett
To: [PLAN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:37:14 AM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Corey Bassett
4378 Utah St. San Diego, CA 92104-1213

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Comment Letter I112: Eowyn Bates, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: ewynbates@everyactioncustom.com on behalf of [Eowyn Bates](#)
To: [PLN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 2:16:13 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Eowyn Bates
4549 Felton St. San Diego, CA 92116-4402

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Comment Letter I113: Lynda Bauer, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: lyndabauer@everactioncustom.com on behalf of Lynda Bauer
To: [PLAN_PLANNING@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 5:44:17 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kamehameha and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Lynda Bauer
1 Vintage Dr Newport Beach, CA 92660-4293

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Comment Letter I114: Camila Bautista, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: camila.bautista@bevacationcustom.com on behalf of [Camila Bautista](#)
To: [PLAN_PLANNING@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 2:33:07 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Camila Bautista
48521 Camino Real, Coachella, CA 92236-6376

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Comment Letter I115: Lori Baxter, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: lbaxteralk@severafactioncustom.com on behalf of LORI BAXTER
To: [PLAN_PLANNING@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 3:03:23 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
LORI BAXTER
8133 Pasadena Ave La Mesa, CA 91941-6424

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Comment Letter I116: Susan Bedford, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: susanbedford@everaction-custom.com on behalf of Susan Bedford
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 6:30:08 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Susan Bedford
29507 Platanus Dr Escondido, CA 92026-5941

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Comment Letter I117: Melissa Behar, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: beharmelissa@everaction.com on behalf of [Melissa Behar](#)
To: [PLAN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 4:11:48 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Melissa Behar
4747 Mount Saint Helens Way San Diego, CA 92117-3029

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Comment Letter I118: Kathy Beitscher, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: kbs54@severactioncustom.com on behalf of Kathy Beitscher
To: [PLAN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:49:01 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Kathy Beitscher
4910 Crestland Dr La Mesa, CA 91941-5732

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Comment Letter I119: Mercedes Benet, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: benetmercedes@beyeractioncustom.com on behalf of Mercedes Benet
To: [EJL Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 4:46:02 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Mercedes Benet
2440 La Costa Ave. Carlsbad, CA 92009-7301

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Comment Letter I120: Barbara Benjamin, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: ncd@scrippservation.com on behalf of Barbara Benjamin
To: [EIR_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:55:36 AM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Barbara Benjamin
12852 Superior Hollow Rd. Valley Center, CA 92082-5016

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Comment Letter I121: Elaine Benjamin, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: elabene@severaction.com on behalf of Elaine Benjamin
To: [PLN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 4:00:37 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Elaine Benjamin
2627 Eltinge Dr. Alpine, CA 91901-2240

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Comment Letter I122: Kim Berger, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: kimberger529@seweractioncostum.com on behalf of Kim Berger
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:30:46 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Kim Berger
5022 Avenida De La Plata, Oceanside, CA 92057-8018

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Comment Letter I123: Brenda Bergstrom, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: brenberg2577@verizoncustcom.com on behalf of [Brenda Bergstrom](#)
To: [Sandel, Scott](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:48:02 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Scott Sandel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Brenda Bergstrom
1255 N Broadway Escondido, CA 92026-2863

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Comment Letter I124: S.F. Bernardo, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: sharon.dequib@evryactioncustom.com on behalf of S.F. Bernardo
To: [E.N. Flanning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:43:19 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
S.F. Bernardo
6820 Briarwood Dr Carlsbad, CA 92011-3924

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Comment Letter I125: Rover Bernhard, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: roverbernhard@everactioncustom.com on behalf of [Rover Bernhard](#)
To: [PLAN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:58:07 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Rover Bernhard
3570 31st St San Diego, CA 92104-4210

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Comment Letter I126: Donald Betts, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: donaldbetts14@everaction.com on behalf of Donald Betts
To: [E.N. Flanning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:32:28 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Donald Betts
3621 Vista Campana S. Oceanside, CA 92057-8246

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Comment Letter I127: Blaze Bhence, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: bbhence@severactioncustom.com on behalf of [Blaze Bhence](#)
To: [PLAN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:04:03 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Blaze Bhence
4190 Elizabeth Ct. Cypress, CA 90630-4119

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Comment Letter I128: Alice Bickers, April 19, 2023

I128

From: alice.bickers@severactionconsult.com on behalf of Alice Bickers
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 4:46:57 PM

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Dear CEQA Planning Department,

- I128-1 | As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.
 - I128-2 | The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.
 - I128-3 | The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.
 - I128-4 | The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.
 - I128-5 | The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rats. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.
 - I128-6 | The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeiyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.
 - I128-7 | Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.
- Sincerely,
 Alice Bickers
 1658 Boulder Creek Rd. Oceanside, CA 92056-2929

I128-1: This comment requests that the City of San Diego (City) prioritize the need for maximum wetland restoration. This comment will be provided to decision makers for their consideration. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is warranted.

I128-2: This comment states that the PEIR should include a project objective that prioritizes improving water quality through natural resilient infrastructure. The project objectives listed in PEIR Chapter 3, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Section 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

I128-3: This comment states that the PEIR is missing details on the foreseeable impacts from sea level rise. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland

habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

I128-4: The comment states that the PEIR fails to consider the ReWild Mission Bay “Wildest” proposal in relation to the City’s Climate Action Plan (CAP) restoration goal of 700 acres of restored tidal marsh by 2035.

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. Chapter 8.0 evaluates four alternatives that were selected for additional analysis; in addition, Chapter 8.0 also identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the ReWild Mission Bay “Wildest” proposal, is provided in Chapter 8.0.

Other restoration areas within the City’s jurisdiction are being considered to meet the goals of the City’s Climate Action Plan (CAP). The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 227 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City’s CAP. As identified in the City’s CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and

preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

I128-5: This comment states that the endangered Ridgway's rail and other threatened and endangered native species will lose their habitat as sea levels rise and will be lost if the rewilding process is not started now. A project-specific Sea Level Rise Study has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The project would expand habitat areas, resulting in long-term benefits to wetland habitat; species, including the endangered Ridgway's rail; and the functions and values of the aquatic resources. No further revisions to the PEIR are warranted.

I128-6: This comment states that the PEIR fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem, and that all San Diegans will benefit from access to a vibrant tidal marsh. The City concurs that access to a restored tidal ecosystem would be a benefit to all San Diegans, including members of local Tribal nations. However, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." No revisions to the PEIR are warranted.

I128-7: This comment concludes the comment letter by offering a thank you for consideration. This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is warranted.

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Comment Letter I129: Amanda Bird, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: amanda.131rd@everactive.com on behalf of [@amanda_bird](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:07:19 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Amanda Bird
4922 1/2 Old Cliffs Rd. San Diego, CA 92120-1148

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Comment Letter I130: Kathy Blackmarr, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: blackmarr@seerivactorcustom.com on behalf of [Kathy Blackmarr](#)
To: [E.N. Flanning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:23:48 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Kathy Blackmarr
5291 Victoria Pl Westminster, CA 92683-4847

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Comment Letter I131: Susan Blain, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: sblain@severactgroup.com on behalf of Susan Blain
To: [PLAN_PLANNING@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:43:34 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Susan Blain
4353 34th St. San Diego, CA 92104-1462

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Comment Letter I132: John Bochenek, April 19, 2023

I132

From: Andrew Smisek
To: Sanderl, Scott; EUI Planning/COA
Subject: [EXTERNAL] De Anza Natural Plan & Analyzed Alternatives
Date: Saturday, March 25, 2023 8:07:42 AM

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I132-1
I132-2
I132-3

I support prioritizing wetland restoration here; it's the best place in the City to meet our Climate Action Goals. I want more wetlands because they clean the water for all the recreational users of the Bay—we need that. The EIR is incomplete without analyzing the coming impacts from sea level rise—show us how you preserve the restored wetlands like the Master Plan calls for. We need to choose the alternative that proposes the most wetlands and other native habitat areas to best plan for climate change and future pressures on native plant and animal species. The future humans will appreciate our forethought too.

Thank you,
Andrew Smisek

I132-1: This comment requests that the City of San Diego (City) prioritize the need for maximum wetland restoration. This comment will be provided to decision makers for their consideration. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is warranted.

I132-2: This comment states that the PEIR is incomplete without analyzing the impacts of sea level rise. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

I132-3: This comment concludes the comment letter by offering a thank you for consideration. This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is warranted.

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Comment Letter I133: John Bogut, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: johnbogut@severalcitiesinc.com on behalf of John D. Bogut
To: [PLN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 8:03:23 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
John D. Bogut
13121 Monroe St. Garden Grove, CA 92844-1124

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Comment Letter I134: Richard Bold, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: rbold@man@severacien.com on behalf of Richard Bold
To: [PLAN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:13:18 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Richard Bold
2098 Hawley Dr Vista, CA 92084-2613

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Comment Letter I135: Lyn Booth, April 19, 2023

I135

From: [Lyn Booth](#)
To: [PLN_Planning/CEQA](#)
Subject: [EXTERNAL] comments re: PEIR for De Anza
Date: Wednesday, April 19, 2023 11:44:18 AM

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I135-1
 I135-2
 I135-3
 I135-4

I am concerned about some proposed elements in the De Anza Natural Plan that will add to environmental pollution.

Part of the "active recreation" area is shown to have the Pacific Beach Tennis Club courts moved, as well as the ball fields. This would entail extensive demolition, reconstruction of underlayment and resurfacing of the courts as well as the adjoining parking lot. Ongoing work by heavy equipment and many trips for trucking concrete and hardscape materials would be necessary. This would add to air pollution due to dust and debris, as well as gas consumption and burning of fuel by the trucks.

Presently the 8 courts are not causing environmental damage and serve the recreational needs of our communities of Pacific Beach, Mission Beach, and Clairemont. Should the courts be removed without replacement, literally hundreds of sports enthusiasts would have to continually travel by car to fields and tennis clubs miles away to Peninsula Tennis Club, Robb Field, and other facilities.

The impact of nearby apartment complexes approved by the City of San Diego as yet to be constructed will also require their residents to travel further for recreational facilities. There already is a shortage of such facilities, so competition for tennis, baseball and soccer would force residents to drive even further across the City to play. This would go against the climate goals of maintaining travel within close range of people's homes!

The De Anza Natural Plan, as stated on its website, "is an effort lead (sic) by the City of San Diego to revitalize the project area to provide for the highest and best use of the area to serve the local and regional needs of the public."

As a member of the community and the Pacific Beach Tennis Club, it is my hope that the sports facilities, especially the courts, remain in their current location. It is more economically and environmentally friendly, not to mention more conducive to the mission of the San Diego Parks and Recreation: to provide recreational facilities within neighborhoods.

Lyn Booth
lynbluewaves@gmail.com

I135-1: This comment is an introductory comment and states concern for environmental pollution that would result from the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Specifically, the comment states that heavy equipment and truck trips would add to air pollution from dust, debris, and gas consumption and burning of fuel from trucks. As discussed in Section 5.2, Air Quality and Odor, of the Program Environmental Impact Report (PEIR) for the project, project construction emissions were estimated using California Emissions Estimator Model (CalEEMod), version 2020.4.0. To analyze potential impacts associated with the project, assumptions were made regarding schedule, construction activities, and implementation of the project because these project details are not known at this time. Construction of the project would result in a temporary addition of pollutants to the local airshed caused by soil disturbance (grading), fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials. However, PEIR Section 5.2 concludes that daily construction emissions for the project would not exceed the City of San Diego's (City's) significance thresholds for criteria pollutants. Therefore, impacts associated with a violation of air quality standards would be less than significant during construction.

Furthermore, as discussed in PEIR Chapter 7.0, Other Mandatory Discussion Areas, petroleum, including diesel and gasoline, would be consumed throughout project construction. Fuel consumed by construction equipment

would be the primary energy resource expended during construction, including the transportation of construction materials. It is assumed that heavy-duty construction equipment and haul trucks involved in moving dirt around the project area would require diesel fuel. Petroleum use during project construction would be temporary and minimal. Furthermore, construction equipment used for future development projects is anticipated to become more efficient as engines are replaced, exhaust systems are retrofitted, and older equipment is retired and new equipment meeting more stringent emission standards is put into service, thus further reducing construction-related energy consumption. Future projects would also be required to comply with the California Air Resource Board's Airborne Toxic Control Measures, which restrict heavy-duty diesel vehicle idling time to 5 minutes. Therefore, development implemented in accordance with the project would not result in the use of wasteful amounts of fuel or other forms of energy during the construction of future projects. Impacts would be less than significant.

I135-2: This comment states that, if the tennis courts are removed, sports enthusiasts would have to travel far to access facilities. In response to this comment and others, PEIR Figure 3-1, Site Plan, and PEIR Table 3-2, Proposed Land Use Acreages, in PEIR Chapter 3.0, Project Description, have been revised in the Final PEIR to reflect a no net loss of active recreation use acreage compared to the existing condition. In addition, the City will strive to design and phase development of future facilities in a manner that minimizes disruption to active recreation access. Any necessary buffer zones and other land uses proposed on existing recreation facilities would be implemented after

these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. There is no plan to reduce the active recreation acreage occupied by the Pacific Beach Tennis Club, although the current footprint may be shifted over time. At this time, no development is proposed, and no design is available. Thus, the evaluation of potential future changes is speculative.

I135-3: This comment states that the nearby apartment complexes approved by the City that have yet to be constructed will also require their residents to travel farther for recreational facilities. In accordance with CEQA, future residential development projects would be required to analyze the increase in demand for public park and recreation facilities and their physical impact on those facilities. Those future projects would be required to mitigate for any significant impacts to recreational facilities. Please refer to response to comment I135-2.

I135-4: This comment provides support for the Pacific Beach Tennis Club to remain in its current location. Please refer to response to comment I135-2.

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Comment Letter I136: Carol Boyd, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: cboyd59@severactioncustom.com on behalf of Carol Boyd
To: [E.N. Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 5:35:08 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Carol Boyd
1015 S Rose St Escondido, CA 92027-4064

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Comment Letter I137: Julie Brickell, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: juliebrickell@seeyactioncustom.com on behalf of Julie Brickell
To: [PLN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:31:41 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Julie Brickell
210 W Union Ave Apt 113 Fullerton, CA 92832-1204

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Comment Letter I138: Julia Broad, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: juliabroad@everysacioncustom.com on behalf of Julia Broad
To: [PLAN_PLANNING@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:39:09 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Julia Broad
9671 Rosebay St. Anaheim, CA 92804-3435

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Comment Letter I139: Barbara Bruce, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: barbarabruce@seerivactionsystem.com on behalf of Barbara Bruce
To: [PLAN_PLANNING@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:43:45 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Barbara Bruce
5 Fontaine - Trabucco Canyon, CA 92679-4904

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Comment Letter I140: Ben Brucker, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: bbrucker2@evanaction.com on behalf of Ben Brucker
To: [DLH Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 6:18:21 PM

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Dear CEQA Planning Department,

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Ben Brucker
34509 Calle Carmelita Capistrano Beach, CA 92624-1023

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Comment Letter I141: Carrie Brummette, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: carriebrummette@evryactioncustom.com on behalf of Carrie Brummette
To: [PLH Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:33:39 PM

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Carrie Brummette
40791 Daily Rd, Fallbrook, CA 92028-9177

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Comment Letter I142: Connie Butler, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: butlersat@everactioncustom.com on behalf of [Connie Butler](#)
To: [PLH_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 7:21:03 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Connie Butler
611 Via Pavon, San Clemente, CA 92672-3537

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Comment Letter I143: Doug Cain, April 19, 2023

I143

From: Doug Cain
To: E.N. Planning/COG
Subject: [EXTERNAL] Protect Recreation in De Anza
Date: Wednesday, April 19, 2023 2:01:04 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

- I143-1
 - I143-2
 - I143-3
 - I143-4
 - I143-5
 - I143-6
 - I143-7
 - I143-8
 - I143-9
 - I143-10
- The city's final Environmental Impact Report (EIR) for this project must recognize that there are currently several millions of organized recreation in existing venues each year and millions more hours in casual unorganized recreation in this area. Current recreational facilities are not adequate for the existing needs. The ball fields need rebuilding, the racquet sports facility has no bathrooms and is in need of additional courts. This regional recreational asset has no soccer field, no aquatic center, no skate park and more. In addition, approximately 8,000 additional residents are being zoned to be added to the Mission Bay Drive Corridor. This corner of Mission Bay Park will need to operate as their neighborhood park. Is this additional population recognized in the plan? Many who live across and east of Highway 5 have expressed a need for Mission Bay Park to be a neighborhood park for their community. However, there is no safe pedestrian or bicycle path of travel to Mission Bay Park. Have these additional demands for park space been analyzed? Approximately 60% of those who camp in the shoreline campsites live in San Diego County and about 90% live in Southern California. Campsites near the water are a major high demand recreational feature that has been part of Mission Bay Park for decades. How will any reduction in public accessibility to low cost overnight stays near the water be mitigated? If the city De Anza "natural" plan reduces recreational park space how will that be mitigated? If the plan reduces shoreline access how will that be mitigated? If the water area for boating, swimming, kayaking is reduced, how will that loss be mitigated? There is clearly a need for more recreation venues. How can less space devoted for recreation be justified? There are other areas of potential marshland that should be considered before any disruption of current recreation and parkland is considered. Have any other areas in the region been considered for marshland development? Has marshland at the outfall of Teocolote creek been considered? What are the financial implications of this plan? Fewer campsites mean less revenue to the Mission Bay Park Fund. What is the financial cost of fewer campsites? What are the costs related to building marshland on the West side of Rose Creek? On the east side of Rose Creek? What are the environmental costs of digging down and removing thousands and thousands of yards of land mass? What is the carbon footprint of that deconstruction? What hazardous toxic wastes are likely to be found and exposed with that amount of land mass disruption? Those who have reviewed various plans have a desire for a balance between education, recreation and the environment. The redevelopment should enhance each and diminish none!

Thank You,
 Doug, Lisa and Reid Cain
 Homeowners and Business Owners in Pacific Beach
 Student at Mission Bay High

I143-1: This comment states that the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) should recognize the organized and unorganized recreation events in the area and the inadequacy of existing facilities. PEIR Chapter 2.0, Environmental Setting, establishes the analyzed project area. Section 2.3.1.1, Existing Land Uses, identifies the existing uses of the project area, including regional parkland and active recreation uses such as Mission Bay Golf Course and Practice Center operated and managed by the City of San Diego (City), the Pacific Beach Playing Fields (also known as the Bob McEvoy Field Complex) currently used by the Mission Bay Little League and Pacific Youth Soccer League, the Mission Bay Boat and Ski Club, and tennis courts and clubhouse currently used by the Pacific Beach Tennis Club. The existing uses form the baseline from which the PEIR evaluates the impacts of the project at the program level. Improvements to current facilities may be implemented as future projects come forward. Future projects will be subject to the City's General Development Plan process to ensure that all requirements are met before they are approved. This comment does not address the adequacy or accuracy of the PEIR, and no further response is warranted. No revisions to the PEIR are warranted.

I143-2: This comment states that existing facilities as identified in the comment need renovations. This is not a California Environmental Quality Act (CEQA) issue, and the comment

does not address the adequacy or accuracy of the PEIR. No further response is warranted.

I143-3: This comment inquires if the additional population in the area was recognized in the plan. As discussed in PEIR Section 7.2.5, Population and Housing, the project would not introduce additional residents to the area or substantial population growth in the area either directly or indirectly. In accordance with CEQA, future residential development projects would be required to analyze the increase in demand for public park and recreation facilities and their physical impact on those facilities. Those future projects would be required to mitigate for any significant impacts to recreational facilities. No revisions to the PEIR are wanted.

I143-4: This comment states that residents across Interstate 5 expressed desire for a neighborhood park in Mission Bay but have no safe pedestrian or bicycle path. Please see response to comment I143-3 regarding the demands for park space from future residents. The project would provide improved pedestrian and bicycle infrastructure to connect the active recreation uses on site to the surrounding community through connections to existing facilities, including the Class II bike lanes along Grand Avenue and Class III bike routes along North Mission Bay Drive. No revisions to the PEIR are warranted.

I143-5: This comment states that the project would reduce low-cost campsites and park space and shoreline access, and asks how these reductions would be mitigated.

The project would replace much of the low-cost visitor guest accommodations offered by Campland on the Bay

(Campland) and Mission Bay RV Resort by providing 48.5 acres of new low-cost visitor guest accommodations, which would include land use for recreational vehicles, cabins, or other eco-friendly accommodations. The project also includes active and passive recreational amenities to include but not be limited to: sand volleyball, pickleball, tennis, walking, cycling, athletic fields, and inline/roller skating and a sandy beach area at the northern and western edges of De Anza Cove. The project would improve access to the park areas along the bay shoreline for residents and visitors. As described in PEIR Chapter 3.0, Project Description, the project would provide a waterfront multi-use path that would provide users with shore access and would connect the project area to points to the north, west, and east to enhance public equitable access and increase connections to the surrounding communities. The multi-use path would be a feature for users to view the marshes and have distant views of Mission Bay. In addition, areas designated as Regional Parkland would include passive recreation amenities such as overlooks, pathways, and picnic areas. Finally, Figure 3-1, Site Plan, and Table 3-2, Proposed Land Use Acreages, have been revised in the Final PEIR to reflect a no net loss of active recreation uses compared to the existing condition.

A boat facility and shared clubhouse would be sited on the northern shore of De Anza Cove and would provide watercraft access on De Anza Cove. In addition, no changes are proposed for the existing boat ramp southeast of the project area that is easily accessed from Interstate 5. A sandy beach area at the northern and western edges of De Anza Cove would be adjacent to the

low-cost visitor guest accommodations use and the boating use. The project would provide a range of recreational features consistent with the Mission Bay Park Master Plan.

I143-6: The comment asks if other areas of potential tidal marshland, including Tecolote Creek, have been considered. The proposed project is the De Anza Natural Amendment to the Mission Bay Park Master Plan. As stated in response to comment I143-1, PEIR Chapter 2.0 establishes the analyzed project area, which is identified as the northeastern corner of Mission Bay Park. The project focuses on habitat enhancements within the boundaries of the project area as outlined in Chapter 2.0. Tecolote Creek is outside the boundary of the project area.

Other restoration areas within the City's jurisdiction are being considered to meet the goals of the City's Climate Action Plan (CAP). The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 227 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its

2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

I143-7: The comment asks about construction costs associated with implementation of the plan, financial costs of fewer campsites, and costs associated with building marshland on the western and eastern sides of Rose Creek. CEQA Guidelines, Section 15131, specifically states that “economic or social effects of a project shall not be treated as significant effects on the environment.” CEQA defines “environment” as “the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance” (California Public Resources Code, Section 21060.5). An EIR project analysis is limited to those socioeconomic issues that could result in a direct change to the physical environment. Therefore, the economic cost of the project is not required to be analyzed in the PEIR. No revisions to the PEIR are warranted.

The comment asks about the environmental costs associated with digging and removing yards of land mass. The PEIR was prepared to identify the environmental impacts associated with the implementation of the project, including proposed construction grading. As discussed in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. As described in PEIR Section 1.2.2, Intended Use of the PEIR, General Development Plans would be developed over time and would provide

precise engineering and construction plans for the recreational elements of the project.

However, as further discussed in PEIR Chapter 3.0, the proposed habitat area improvements would involve the conversion of the existing Campland property to natural habitat area, as anticipated in the Mission Bay Park Master Plan. This would involve the demolition of the developed area within Campland, including structures, pavement and utilities, and demolition of the adjacent boat docks to the south. It would also involve the backfill of portions of the bay south of the proposed marsh and southwest of the proposed low-cost visitor guest accommodations area. Grading related to construction of the project is estimated to be balanced on site with approximately 873,886 cubic yards of overall cut and fill. PEIR Table S-4, Summary of Significant Environmental Impacts, provides a summary of the environmental impacts associated with the project and mitigation measures proposed to reduce those impacts. Therefore, the PEIR adequately analyzes the impacts of project construction, including grading activities. No revisions to the PEIR are warranted.

I143-8: The comment asks about the carbon footprint associated with the proposed grading activities. This is addressed in PEIR Section 5.4, Greenhouse Gas Emissions, which analyzes the potential impacts related to greenhouse gas (GHG) emissions that could result from the implementation of the project. Please refer to response to comment above for grading assumptions. The PEIR concludes that temporary project construction emissions were included in the City's CAP GHG emissions inventory

and business-as-usual GHG emissions projections; therefore, they were accounted for in the City's CAP. Thus, compliance with the City's CAP Consistency Regulations upon implementation of the project would result in less than significant impacts associated with GHG emissions. Therefore, the PEIR adequately analyzes the GHG impacts of proposed project construction, including grading activities. No revisions to the PEIR are warranted.

I143-9: The comment inquires as to what toxic wastes would be found during project construction. This is addressed in PEIR Section 5.5, Hazards and Hazardous Materials, which analyzes potential impacts related to hazards and hazardous materials, including public health and safety, that could result from the implementation of the project. The Phase I Environmental Site Assessment (PEIR Appendix F) was conducted for the project area and included a review of historical source information, search of regulatory agency databases within specified distances of the subject property, review of available local agency records, interviews, and site reconnaissance. The PEIR concludes that construction of the project could encounter contaminated soils during grading and excavation, which could result in adverse hazards and hazardous materials impacts to on-site construction/grading personnel and cross-contamination of soils if contaminated soil is placed as fill in currently uncontaminated areas. The project would be required to implement Mitigation Measures MM HAZ 5.5-1 through MM HAZ 5.5-4 to reduce impacts. Therefore, the PEIR adequately analyzes hazardous material impacts of the project. No revisions to the PEIR are warranted.

I143-10: This comment requests consideration for a balance between education, recreation, and the environment. The Mission Bay Park Master Plan calls for a “balanced approach” with three components: recreation, commerce, and environment. This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

Comment Letter I144: Susan Cameron-Brown, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: susan_cameron@severactioncustom.com on behalf of Susan Cameron-Brown
To: [PLH Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 4:41:49 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeayay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Susan Cameron-Brown
15955 Mount Jackson St Fountain Vly, CA 92708-1328

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Comment Letter I145: K Campbell, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: kcfob@severactioncustom.com on behalf of [k.campbell](#)
To: [E.H. Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 6:09:26 PM

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Dear CEQA Planning Department,

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
k.campbell
704 Van Nuys St. San Diego, CA 92109-1052

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Comment Letter I146: Keith Campbell, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: k.camp@sevraxactionsystem.com on behalf of Keith Campbell
To: [E.H. Banning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:26:45 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Keith Campbell
10302 Lake Ridge Ct Spring Valley, CA 91977-5423

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Comment Letter I147: Nydia Cardona, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: n.cardona@severactioncustom.com on behalf of Nydia Cardona
To: [PLH Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:09:48 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Nydia Cardona
34216 Sundew Ct Lake Elsinore, CA 92532-2973

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Comment Letter I148: David Carlson, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: dcarlson@severaction.com on behalf of David Carlson
To: Sandel, Scott
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 2:11:17 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Scott Sandel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
David Carlson
7835 Rush Rose Dr Unit 310 Carlsbad, CA 92009-6829

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Comment Letter I149: David Carlson, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: dcarlso@seviyacountyecosystem.com on behalf of David Carp
To: [PLH_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:36:42 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
David Carp
66110 San Juan Rd. Desert Hot Springs, CA 92240-2338

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Comment Letter I150: Dan Carroll, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: naycomet@severactioncustom.com on behalf of [Dan Carroll](#)
To: [PLH_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:56:59 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Dan Carroll
2005 N Whitewater Club Dr. Palm Springs, CA 92262-4005

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Comment Letter I151: Loretta Caruana, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: lorcaruana@everlyactioncenter.com on behalf of [Loretta Caruana Caruana](#)
To: [Sandel, Scott](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:22:23 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Scott Sandel,

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The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Loretta Caruana Caruana
1223 Santa Barbara Dr Newport Beach, CA 92660-6371

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Comment Letter I152: Nicole Cervi-McKeever, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: nicole.cervi@cityofsanjose.com on behalf of [Nicole Cervi-McKeever](#)
To: [PLH Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 4:40:53 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Nicole Cervi-McKeever
21193 Gladiolos Way Lake Forest, CA 92630-7618

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Comment Letter I153: Lisa Chaddock, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: lchaddock@severactioncustom.com on behalf of [Lisa Chaddock](#)
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:42:06 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities. The statement that "no project" would protect cultural sites in a place that we'd terraformed in the 1950s is completely unrealistic. We can do better now by creating a private space for Kumeyaay people to have access for cultural activities. Please consider the ReWild plan, which has been created with community input and feedback, and accounts for sea level rise, cultural access and community activities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Lisa Chaddock
4440 Alamo Way San Diego, CA 92115-5908

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Comment Letter I154: Pete Childs, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: pachilds69@severactioncustom.com on behalf of [pete childs](#)
To: [PNH_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:20:57 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
pete childs
70100 Mirage Cove Dr Unit 20 Rancho Mirage, CA 92270-2972

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Comment Letter I155: Chase Choate, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: skidc@everwetland.com on behalf of [Chase Choate](#)
To: [PLN_Planinfo@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 5:10:53 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Chase Choate
1675 Arnold Rd Spe 9 Winterhaven, CA 92283-9599

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Comment Letter I156: Sarah Chotiner, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: sarah.chotiner@everyactioncustom.com on behalf of Sarah Chotiner
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 2:22:33 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Sarah Chotiner
12879 Flintwood Way San Diego, CA 92130-5747

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Comment Letter I157: Christie Ross, April 19, 2023

I157

From: [ross.christie](#)
To: [Sandel, Scott](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan
Date: Wednesday, April 19, 2023 3:38:41 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Hello,

I157-1

I am a many years resident of Pacific Beach in San Diego and I would like to express my support of ReWild and the need for the maximum restored wetlands plan.

Thank you,

Ross Christie

I157-1: This comment provides support for ReWild Mission Bay and the need for a maximum restored wetlands plan. Chapter 8.0, Alternatives, of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) evaluates four alternatives that would reduce impacts compared to the proposed project (No Project/No Build Alternative, Wetlands Optimized Alternative, Enhanced Wetlands/Optimized Parkland Alternative, and Resiliency Optimized Alternative). The PEIR goes above the requirements of the California Environmental Quality Act (CEQA) by providing an evaluation of the Wetlands Optimized Alternative in an equal level of detail, while the other alternatives are compared to the project consistent with CEQA Guidelines, Section 15126.6(b). The ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives are discussed in PEIR Section 8.2, Alternatives Considered and Eliminated. The Mission Bay Park Master Plan calls for a “balanced approach” with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project proposes 146.5 acres of active recreation, regional parklands, open beach, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

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Comment Letter I158: Keith Christy, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: kchristy208@sevensactioncustom.com on behalf of [Keith Christy](#)
To: [PLU Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 4:32:59 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Keith Christy
4340 Lindsay St. Jurupa Valley, CA 92509-2569

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Comment Letter I159: Robin Clark, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: rjclark2@evervationconsulting.com on behalf of [Robin Clark](#)
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:27:28 PM

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Dear CEQA Planning Department,

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Robin Clark
21962 Tobarra Mission Viejo, CA 92692-4213

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Comment Letter I160: Robyn Class, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: robyn.class@everactioncustom.com on behalf of [Robyn Class](#)
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:09:11 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Robyn Class
703 E Sycamore Ave Orange, CA 92866-1153

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Comment Letter I161: Angela Clayton, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: angclayton@sevenactioncustom.com on behalf of [Angela Clayton](#)
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:01:16 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Angela Clayton
1580 Shadowridge Dr Apt 157 Vista, CA 92081-9036

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Comment Letter I162: Cynthia Clayton, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: bitsy@beverlyhilton.com on behalf of Cynthia Clayton
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:45:30 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Cynthia Clayton
11226 Monticook Ct San Diego, CA 92127-3124

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Comment Letter I163: Mary Clumeck, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: mactall@everlyactioncustom.com on behalf of [Mary Clumeck](#)
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:56:38 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Mary Clumeck
1532 Wyodham Court Rd. Santa Ana, CA 92705-3114

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Comment Letter I164: Luanne Coker, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: luannecoker@everyactioncustom.com on behalf of [Luanne Coker](#)
To: [PLN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 2:57:11 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Luanne Coker
1286 Seacoast Dr Imperial Beach, CA 91932-3168

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Comment Letter I165: Mary Collett, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: mycollet23@evernachoncustorm.com on behalf of Mary Collett
To: [PLM Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 3:51:10 PM

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Dear CEQA Planning Department,

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Mary Collett
85 O'Hear Ct. Waterbury, VT 05676

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Comment Letter I166: Kay Collins, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: kcollins@severactioncustom.com on behalf of Kay Collins
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:50:55 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Kay Collins
6073 Nauru St. Cypress, CA 90630-5644

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Comment Letter I167: Susan Coombs, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: coombs.susan@severafactorcustom.com on behalf of Susan Coombs
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 3:18:49 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Susan Coombs
4045 Carmel View Rd Unit 89 San Diego, CA 92130-2341

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Comment Letter I168: Betty Cooper, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: cooperbetty@severactioncustom.com on behalf of BETTY COOPER
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:03:22 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
BETTY COOPER
8647 Capricorn Way San Diego, CA 92126-1850

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Comment Letter I169: Andrea Cornelius, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: acornelius@everyactioncustom.com on behalf of [Andrea Cornelius](#)
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:50:47 AM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Andrea Cornelius
1615 Dichoso Dr Escondido, CA 92025-6220

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Comment Letter I170: Stacy Cornelius, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: stacycornelius@evnactioncustom.com on behalf of Stacy Cornelius
To: [E.N. Flannino/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 4:11:59 PM

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Dear CEQA Planning Department,

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Stacy Cornelius
530 Mountain Rd Apt A Laguna Beach, CA 92651-3160

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Comment Letter I171: Ann Coulston, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: anncoulston@severactioncustom.com on behalf of [Ann Coulston](#)
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:47:59 PM

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Dear CEQA Planning Department,

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Ann Coulston
1850 Sand Hill Rd Apt 24 Palo Alto, CA 94304-2162

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Comment Letter I172: Maria Elena Crabb, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: m.elenscrabb@seerivactioncustom.com on behalf of [Maria Elena Crabb](#)
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:58:28 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Maria Elena Crabb
10669 Haven Brook Pl San Diego, CA 92130-4844

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Comment Letter I173: Taylor Crandall, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: taylorcrandall@everyactioncustom.com on behalf of Taylor Crandall
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:26:19 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Taylor Crandall
925 Agate St. San Diego, CA 92109-1119

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Comment Letter I174: Carole Dadurka, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: caroledad@severactioncustom.com on behalf of [Carole Dadurka](#)
To: [EIR Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 9:20:35 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Carole Dadurka
3716 Calle Casino San Clemente, CA 92673-2705

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Comment Letter I175: Wendy Dallas, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: wendydallas@everyactioncustom.com on behalf of Wendy Dallas
To: [PLN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 5:17:39 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Wendy Dallas
5281 Setting Sun Way San Diego, CA 92121-1221

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Comment Letter I176: Priscilla Dalpra, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: priscilla.dalpra@everystactioncustom.com on behalf of [Priscilla Dalpra](#)
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:03:48 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Priscilla Dalpra
2871 Barnard St. San Diego, CA 92110-5730

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Comment Letter I177: Rita Davenport, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: ritadavenport33@everjaboxcustom.com on behalf of [Rita Davenport](#)
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 6:08:44 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeayay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Rita Davenport
232 E Peck St # C Lake Elsinore, CA 92530-4126

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Comment Letter I178: Timothy Davis, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: tdavis54@everactionconsult.com on behalf of [Timothy Davis](#)
To: [EIR Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 6:17:53 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Timothy Davis
6121 Lenore Ave Garden Grove, CA 92845-2736

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Comment Letter I179: Jonathan Day, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: jon.day1@everactioncustom.com on behalf of Jonathan Day
To: [ELN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 3:30:58 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeayaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Jonathan Day
3221 Alta Laguna Blvd Laguna Beach, CA 92651-2059

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Comment Letter I180: Barbara De Shann, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: bdshann@everactioncustom.com on behalf of [Barbara De Shann](#)
To: [EIJ Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:50:40 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Barbara De Shann
31641 Rancho Viejo Rd. San Juan Capistrano, CA 92675-2716

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Comment Letter I181: Vivian Derr, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: vivianderr@beverlyactioncustom.com on behalf of [Vivian Derr](#)
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:47:10 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Vivian Derr
11448 Sandstone Ave Fountain Valley, CA 92708-2522

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Comment Letter I182: Jay Desgrosellier, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: desgrois@bevanactioncustom.com on behalf of Jay Desgrosellier
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:46:00 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Jay Desgrosellier
7665 Palmilla Dr Apt 5212 San Diego, CA 92122-5032

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Comment Letter I183: Barbara Diederichs, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: barbara@severactioncustom.com on behalf of [Barbara Diederichs](#)
To: [PLU Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:40:56 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Barbara Diederichs
12956 Christman Ln Foway, CA 92064-5832

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Comment Letter I184: Jacoba Dolloff, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: jcoba@severactionconsult.com on behalf of [Jacoba Dolloff](#)
To: [PLN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:06:52 PM

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Dear CEQA Planning Department,

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The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Jacoba Dolloff
4545 Taft Ave La Mesa, CA 91941-7158

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Comment Letter I185: Britton Donaldson, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: brittondonaldson@severactioncustom.com on behalf of [Britton Donaldson](#)
To: [Sandel, Scott](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 9:00:52 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Scott Sandel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Britton Donaldson
339 W. University Ave Unit B San Diego, CA 92103-2997

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Comment Letter I186: Dawn Douglas, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: dawndouglas@severactioncustom.com on behalf of Dawn Douglas
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 3:29:12 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Dawn Douglas
13190 Carousel Ln, Del Mar, CA 92014-3529

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Comment Letter I187: Linda Douglas, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: ldouglas@severaction.com on behalf of [Linda Douglas](#)
To: [PLN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:42:24 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Linda Douglas
922 Knoll Vista Dr. San Marcos, CA 92078-4803

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Comment Letter I188: Steve Duarte, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: steveduarte028@erxvacationcottages.com on behalf of Steve Duarte
To: EIA Planning/CEQA
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 5:54:11 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Steve Duarte
4940 Del Monte Ave Apt 102 San Diego, CA 92107-6211

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Comment Letter I189: Ann Dugaw, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: adugaw@seerivachoncustom.com on behalf of [Anne Dugaw](#)
To: [PLN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:13:50 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Anne Dugaw
385 Ogle St Apt C Costa Mesa, CA 92627-4762

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Comment Letter I190: Dawn Dulac, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: dawndee56@westvatic.nostrum.com on behalf of Dawn Dulac
To: [PLN_PlanningCEO](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:47:54 AM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Dawn Dulac
6590 Springfield St. San Diego, CA 92114-1527

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Comment Letter I191: Kathleen Leslie Dunn, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: kdunn101@severac.com on behalf of Kathleen Leslie Dunn
To: [B.H. Flaming/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 2:51:46 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Kathleen Leslie Dunn
5907 Charing St. San Diego, CA 92117-4122

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Comment Letter I192: Christie Dunning, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: cd@dunning@everactioncustom.com on behalf of [Christie Dunning](#)
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 4:13:38 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Christie Dunning
2443 Corona Ct. La Jolla, CA 92037-7030

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Comment Letter I193: Martin Edwards, April 19, 2023

I193

From: martin_e.edwards@servactioncustom.com on behalf of Martin Edwards
To: [EIR_Planning@COA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:54:48 AM

** This email came from an external source. Be cautious about clicking on any links in this email or opening attachments. **

Dear CEQA Planning Department,

I193-1 As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

I193-2 The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

I193-3 The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

I193-5 The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

I193-6 The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeiyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

I193-7 Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Martin Edwards
5007 Manor Ridge Ln. San Diego, CA 92130-2895

I193-1: This comment requests that the City of San Diego (City) prioritize the need for maximum wetland restoration. This comment will be provided to decision makers for their consideration. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is warranted.

I193-2: This comment states that the PEIR should include a project objective that prioritizes improving water quality through natural resilient infrastructure. The project objectives listed in PEIR Chapter 3, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Section 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

I193-3: This comment states that the PEIR is missing details on the foreseeable impacts from sea level rise. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland

habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

- I193-4:** The comment states that the PEIR fails to consider the ReWild Mission Bay “Wildest” proposal in relation to the City’s Climate Action Plan (CAP) restoration goal of 700 acres of restored tidal marsh by 2035.

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. Chapter 8.0 evaluates four alternatives that were selected for additional analysis; in addition, Chapter 8.0 also identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the Re Wild Mission Bay “Wildest” proposal, is provided in Chapter 8.0.

Other restoration areas within the City’s jurisdiction are being considered to meet the goals of the City’s Climate Action Plan (CAP). The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 227 acres of wetlands in the Mission Bay Park. The project was not

intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

I193-5: This comment states that the endangered Ridgway's rail and other threatened and endangered native species will lose their habitat as sea levels rise and will be lost if the rewilding process is not started now. A project-specific Sea Level Rise Study has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The project would expand habitat areas, resulting in long-term benefits to wetland habitat; species, including the endangered Ridgway's rail; and the functions and values of the aquatic resources. No further revisions to the PEIR are warranted.

I193-6: This comment states that the PEIR fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem, and that all San Diegans will benefit from access to a vibrant tidal marsh. The City concurs that access to a restored tidal ecosystem would be a benefit to all San Diegans, including members of local Tribal nations. However, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in

which those significant effects can be mitigated or avoided." No revisions to the PEIR are warranted.

I193-7: This comment concludes the comment letter by offering a thank you for consideration. This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is warranted.

Comment Letter I194: Anne Elliott, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: [Sandel, Scott](#)
To: [PLN_PlanningCE06](#)
Subject: FW: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 9:59:55 AM

Scott Sandel

619.235.5204
ssandel@sandiego.gov

-----Original Message-----

From: anneelliott4@everyactioncustom.com <anneelliott4@everyactioncustom.com>
Sent: Wednesday, April 19, 2023 9:59 AM
To: Sandel, Scott <SSandel@sandiego.gov>
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Scott Sandel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. All San Diegans, including our Kumeyaay neighbors and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Anne Elliott

1950 Upas St Unit 304 San Diego, CA 92104-3277

Comment Letter I195: Sherry Fatzinger, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: sherry.fatzinger@severactioncustom.com on behalf of [Sherry Fatzinger](#)
To: [ELN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:44:55 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeayaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Sherry Fatzinger
3401 Lemon St. Riverside, CA 92501-2861

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Comment Letter I196: Kathleen Fernandez, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: kfernandez2576@everactioncustom.com on behalf of [kathleen.fernandez](#)
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 2:21:09 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
kathleen.fernandez
5615 Via De Campo Yorba Linda, CA 92887-4917

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Comment Letter I197: Arthur Fink, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: aafink17@everyactioncustom.com on behalf of [Arthur Fink](#)
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:53:02 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Arthur Fink
5670 Tau St. La Mesa, CA 91942-2844

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Comment Letter I198: Allyson Finkel, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: allyson.finkel@evervationcustom.com on behalf of [Allyson Finkel](#)
To: [PLAN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 6:13:53 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Allyson Finkel
29 Vista Barranca Rsm, CA 92688-1012

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Comment Letter I199: Paula Fitzgerald, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: paula@severactioncustom.com on behalf of Paula Fitzgerald
To: [ELN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:40:55 PM

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Dear CEQA Planning Department,

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Paula Fitzgerald
1122 Sea Village Dr Cardiff By The Sea, CA 92007-1436

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Comment Letter I200: Fraa Fizzz, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: prettvoink1@eyevactioncustom.com on behalf of [Fraa Fizzz](#)
To: [PLR_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 8:03:48 PM

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Dear CEQA Planning Department,

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Fraa Fizzz
13 Nutwood Irvine, CA 92604-3270

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Comment Letter I201: Johannah Frank, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: jo@severaction.com on behalf of [Johannah Frank](#)
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:00:39 PM

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Dear CEQA Planning Department,

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Johannah Frank
2685 Sunset Hills Escondido, CA 92025-7849

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Comment Letter I202: Julie Frank, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: jfrank62@sevensixtycustom.com on behalf of Julie Frank
To: [PLN_Planning/CEO6](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 7:27:28 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Julie Frank
648 Clarence Ln. Escondido, CA 92029-5822

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Comment Letter I203: Luis Fuentes, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: luisfuentes10@everactioncustom.com on behalf of Luis Fuentes
To: [PLU Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 3:02:54 PM

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Dear CEQA Planning Department,

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Luis Fuentes
3415 6th Ave Unit 900 San Diego, CA 92103-5056

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Comment Letter I204: C G, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: cag_92122@everystaction.com on behalf of c g
To: [PLU Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 8:34:33 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
c g
3901 Governor Dr San Diego, CA 92122-2520

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Comment Letter I205: K G, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: ko@mons@servactioncustom.com on behalf of [k.g.](#)
To: [EUI Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:40:59 AM

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Dear CEQA Planning Department,

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
k.g.
1300 9th St. San Diego, CA 92118-2624

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Comment Letter I206: Einar Gall, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: splenicus@everyactioncustom.com <splenicus@everyactioncustom.com>
Sent: Wednesday, April 19, 2023 9:00 AM
To: Sandel, Scott <SSSandel@sandiego.gov>
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Scott Sandel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. All San Diegans, including our Kumeyaay neighbors and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Einar Gall
5820 Folsom Dr. La Jolla, CA 92037-7323

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Comment Letter I207: Juanita Gama, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: j.gama01@sevensactioncustom.com on behalf of [Juanita Gama](#)
To: [EJL Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:59:39 PM

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Dear CEQA Planning Department,

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The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Juanita Gama
39240 Hidden Water Pl Palm Desert, CA 92260-1433

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Comment Letter I208: Armando Garcia, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: mcondowr@sevensixtopecosystem.com on behalf of Armando A Garcia
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 4:05:47 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeayay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Armando A. Garcia
946 Whimbrel Way, Perris, CA 92571-7715

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Comment Letter I209: Ked Garden, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: KedGarden@severyactioncustom.com on behalf of [Ked Garden](#)
To: [Elin Flannigan/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:10:46 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wilder plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wilder proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds - original members of the 1973 Endangered Species Act - will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Ked Garden
2328 Main St. Lemon Grove, CA 91945-3221

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Comment Letter I210: Missy Garvin, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: missy.garvin@evervationcustom.com on behalf of Missy Garvin
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:12:43 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Missy Garvin
2539 Ocean Cove Dr. Cardiff By The Sea, CA 92007-2218

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Comment Letter I211: Michele Gelboin, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: michele06@everactioncustom.com on behalf of Michele Gelboin
To: [Sardel, Scott](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 5:10:45 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Scott Sardel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildcat plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildcat proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Michele Gelboin
8525 Villa La Jolla Dr Apt D La Jolla, CA 92037-2319

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Comment Letter I212: Megan Gibney, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: mgibney@recreationcustom.com on behalf of Megan Gibney
To: [PLU Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:26:15 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Megan Gibney
3544 Camino Carmel Lindg. San Diego, CA 92130-2503

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Comment Letter I213: Robert Giles, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: robert.giles@everactionconsult.com on behalf of Robert Giles
To: [PUI Planning/CEDA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 10:01:52 PM

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Dear CEDA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise: How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Robert Giles
1974 Palsero Ave. Escondido, CA 92029-4210

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Comment Letter I214: Carrie Gingrich, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: chcgyca@segyastimcosystem.com on behalf of Carrie Gingrich
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:54:40 AM

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Dear CEQA Planning Department:

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds - original members of the 1973 Endangered Species Act - will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeiyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Carrie Gingrich
521 Orange Ave Ste 21 Chula Vista, CA 91911-4038

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Comment Letter I215: Joyce Glennon, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: alan@joyceglennon.com on behalf of [joyce glennon](#)
To: [Eli Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 4:29:51 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by aiding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildcat plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildcat proposal against the city's own Climate Action Plan goals.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
joyce glennon
2283 Worden St. San Diego, CA 92107-1611

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Comment Letter I216: Daniel Goldberg, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: dgoldb@severactioncustom.com on behalf of Daniel Goldberg
To: PLH_Elanino@CEQA
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:15:31 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Daniel Goldberg
1209 Baylor Pl. Riverside, CA 92506-4734

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Comment Letter I217: Nerin Gonzalez, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: nerin@lexipz@seeyaction.com on behalf of Nerin Gonzalez
To: [EIJ Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 7:49:11 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kananayay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Nerin Gonzalez
2575 Market St. San Diego, CA 92102-3041

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Comment Letter I218: Brian Gottejman, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: blottejman@severactioncustom.com on behalf of Brian Gottejman
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 2:52:47 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kamehameha and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Brian Gottejman
1701 Bush St Apt 1L, Oceanside, CA 92058-7139

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Comment Letter I219: Kathlyn Grabenstein, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: kgrabenstein@evanactionsonatom.com on behalf of Kathlyn Grabenstein
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:47:45 AM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Kathlyn Grabenstein
3121 Killarney Ln Costa Mesa, CA 92626-2610

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Comment Letter I220: Donna Grampp, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: dgrampp55@evertyachtsincustom.com on behalf of [Donna Grampp](#)
To: [EIR Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:06:20 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeayay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Donna Grampp
506 Jarmory Ln Fullerton, CA 92831-1910

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Comment Letter I221: Liliana Griego, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: Liliana.griego@evergreeneducation.com on behalf of Liliana Griego
To: [PLN_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:37:46 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeayay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Liliana Griego
815 Rollin St. South Pasadena, CA 91030-3750

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Comment Letter I222: Mason Griffith, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: masongriffith@severactioncustomers.com on behalf of Mason Griffith
To: [PL Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 5:03:58 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Mason Griffith
1111 Alturas Rd | Fallbrook, CA 92028-3150

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Comment Letter I223: Michelle Grimes, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: milgrimes@everaction.com on behalf of Michelle Grimes
To: [PLU Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:17:11 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Michelle Grimes
5425 Adams Ave. San Diego, CA 92115-2207

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Comment Letter I224: Alexis Grone, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: alexis.grone@severactioncustom.com on behalf of Alexis Grone
To: [EIR Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:08:33 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Alexis Grone
276 N El Camino Real Spc 67 OceanSide, CA 92058-1734

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Comment Letter I225: Kurt Gross, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: kagross13@evereadbancsitem.com on behalf of Kurt Gross
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:39:04 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kameyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Kurt Gross
PO Box 16898 San Diego, CA 92176-6898

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Comment Letter I226: Eugenia Guilin, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: guilin@servantsofthecosystem.com on behalf of Eugenia Guilin
To: [P.U. Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 4:25:07 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Eugenia Guilin
17406 S Debraun Blvd, Blythe, CA 92225-9215

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Comment Letter I227: Jill Gustafson, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: jillegus@everyactioncustom.com <jillegus@everyactioncustom.com>
Sent: Wednesday, April 19, 2023 6:39 AM
To: Sandel, Scott <SSandel@sandiego.gov>
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Scott Sandel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildcat plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildcat proposal against the city's own Climate Action Plan goals.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. All San Diegans, including our Kumeyaay neighbors and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Jill Gustafson
5680 Dorothy Way San Diego, CA 92115-2307

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Comment Letter I228: Raul Gutierrez, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: raul@rivercrestpousteria.com on behalf of Raul Gutierrez
To: PLN_FlamingoCEQA
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:20:51 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Raul Gutierrez
6260 River Crest Dr Ste B Riverside, CA 92507-0775

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Comment Letter I229: C H, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: cband@29254@weveractionaction.com on behalf of C.H.
To: PLN_Flaming@CEQA
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 3:11:37 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
C.H.
1600 Palm Aye Spc 70 San Diego, CA 92154-1023

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Comment Letter I230: Dale Haas, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: dhaas@ceqaaction.com on behalf of Dale Haas
To: [EIR Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:08:11 PM

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Dear CEQA Planning Department,

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Dale Haas
4743 58th St San Diego, CA 92115-2203

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Comment Letter I231: Karen Hafer, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: karihafer@searayco.com on behalf of Karen Hafer
To: [EUI Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:36:33 AM

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Dear CEQA Planning Department,

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Karen Hafer
220 N Zapata Hwy Laredo, TX 78043-4427

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Comment Letter I232: Jennifer Hagglof, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: jehagglof@everystarcustom.com on behalf of Jennifer Hagglof
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:21:40 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Jennifer Hagglof
6801 Freedom Blvd, Aptos, CA 95003-9620

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Comment Letter I233: Holly Hall, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: hhall51@everactioncistems.com on behalf of [Holly Hall](#)
To: [PLN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 10:20:45 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeayni and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Holly Hall
31621 Corte Rosario, Temecula, CA 92592-6484

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Comment Letter I234: Cathy Handzel, April 19, 2023

I234

From: cathandzel@evervationcustom.com on behalf of Cathy Handzel
To: [P.U. Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 10:02:21 PM

** This email came from an external source. Be cautious about clicking on any links in this email or opening attachments. **

Dear CEQA Planning Department,

I234-1

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

I234-2

Hello, I trust San Diego Audubon Society's conservation knowledge and experience. We must strongly consider their recommendations, now. Not years into this project when reconsideration and additional funding is required because important aspects of planning were not addressed initially.

I234-3

Ecotourism is the fastest growing type of tourism in the world! Bird watching is particularly important aspect and is especially common for wetlands, like our precious Mission Bay provide. Canoeing, kayaking, and rowboat fishing are popular recreational activities for wetlands and are CLEAN ways to enjoy being out on the bay. Racing boats and jet skis pollute with fuel and noise. Let's strive to keep it NATURAL and QUIET.

I234-4

Please adhere to San Diego's LIGHT POLLUTION ORDINANCE and the American Medical Association's guidance to NOT EXCEED 3000K CCT for any lighting in this project area. Using 2200K would be best for nighttime ambiance in this natural setting, and for wildlife protection. Artificial light at night kills millions of migrating birds annually and may affect nesting habits. Even campers with lanterns as bright as car headlights can disrupt the ecosystem - let's keep it dim and enjoy the tranquility of nighttime. The International Dark Sky Association is available to assist with lighting consultation (SD-DarkSky.org).

I234-5

Please prioritize CLEAN WATER through natural, resilient infrastructure, as water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

I234-6

SEA LEVEL RISE must be researched, considered, and prioritized in order to determine the best land-use plan. The ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. The City must consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals to achieve the best De Anza Natural wetland restoration plan.

I234-7

We must BEGIN the ReWilding process NOW to ensure habitat exists to sustain endangered Ridgway's Rails over the next several decades as sea levels rise and their habitat is inundated. Kendall Frost Marsh was visited by hundreds of volunteers that care during Save Your Wetlands - let the City's plan support that care and concern.

I234-8

Prioritize RECREATIONAL and CULTURAL aspects of connecting Mission Bay Park to a restored tidal ecosystem. The Kumeyaay cultural heritage must be taken into consideration. Environmental justice requires that our underserved communities must also benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

I234-9

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
 Cathy Handzel
 5255 Ogden St. San Diego, CA 92105-3233

I234-1: This comment requests that the City of San Diego (City) prioritize the need for maximum wetland restoration. This comment will be provided to decision makers for their consideration. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is warranted.

I234-2: This comment provides support for the San Diego Audubon Society's recommendations. This comment will be provided to decision makers for their consideration. This comment does not address the adequacy or accuracy of the PEIR for the project, and no further response is warranted.

I234-3: This comment states that ecotourism is the fastest growing type of tourism in the world and that bird-watching, canoeing, kayaking, and rowboating are especially common for wetlands. As discussed in PEIR Chapter 3.0, Project Description, regional parkland supports activities such as picnicking, kiteflying, Frisbee games, informal sports, walking, jogging, children's play, bicycling, and skating. The upland (dune, sage) and buffer areas would accommodate the proposed multi-use path with educational signage and, in some instances, mounded landforms. The mounded landforms would feature native coastal sage, dune, and other native plants that would be seen and experienced from the waterfront multi-use path. Within this area, passive recreation amenities such as overlooks, pathways, picnic areas, and interpretive signs could be accommodated and would

provide opportunities for bird-watching activities. Access for non-motorized watercraft, including kayaks and canoes, would be provided in De Anza Cove at the proposed Boat Facilities/Clubhouse land use and/or in association with the low-cost visitor guest accommodation lease. This comment does not address the adequacy or accuracy of the PEIR for the project, and no further response is warranted.

I234-4: This comment requests adherence to the light pollution ordinance. As discussed in PEIR Chapter 7.0, Other Mandatory Discussion Areas, implementation of the project would result in additional sources of light at various points in the project area, particularly in the low-cost visitor guest accommodation area and the De Anza Cove Park area. Further, in accordance with the Mission Bay Park Master Plan (MBPMP) Design Guidelines in the MBPMP Update (November 2021), path and parking lot lighting would be implemented for nighttime use and security purposes. The MBPMP Design Guidelines indicate that “lighting should be provided by cut-off, non-glare pole fixtures. The height of light fixture shall be 12 to 15 feet above the adjacent surface of the path.” Additionally, where paths or lit areas affront residential or resort hotel areas, “2-1/2 to 3-1/2 feet height bollard-type lights should be used . . . so as not to affect the nighttime view of the Bay from residences and guest rooms” (MBPMP Update [November 2021]). Therefore, downward-pointing, lower-intensity lights would be used. In addition, this type of lighting would comply with the Multi-Habitat Planning Area (MHPA) Land Use Adjacency Guidelines, which require

lighting of all developed areas adjacent to the MHPA to be directed away from the MHPA.

I234-5: This comment requests that the City prioritize cleaning water through maximum wetland restoration. This comment will be provided to decision makers for their consideration. This comment does not address the adequacy or accuracy of the PEIR for the project, and no further response is warranted.

I234-6: This comment states that sea level rise must be researched, considered, and prioritized to determine the best land use plan and that the ReWild Mission Bay “Wildest” proposal should be considered in relation to the City’s Climate Action Plan (CAP) restoration goal of 700 acres of restored tidal marsh by 2035.

A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

Furthermore, pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. Chapter 8.0

evaluates four alternatives that were selected for additional analysis; in addition, Chapter 8.0 also identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the Re Wild Mission Bay “Wildest” proposal, is provided in Chapter 8.0.

Other restoration areas within the City’s jurisdiction are being considered to meet the goals of the City’s Climate Action Plan (CAP). The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 227 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City’s CAP. As identified in the City’s CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

I234-7: This comment states that the endangered Ridgway’s rail and other threatened and endangered native species will lose their habitat as sea levels rise and will be lost if the rewilding process is not started now. A project-specific Sea Level Rise Study has been prepared and is included in the

Final PEIR as Appendix N to inform the future design of the project. The project would expand habitat areas, resulting in long-term benefits to wetland habitat; species, including the endangered Ridgway's rail; and the functions and values of the aquatic resources. No further revisions to the PEIR are warranted.

I234-8: This comment states that the PEIR fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem, and that all San Diegans will benefit from access to a vibrant tidal marsh. The City concurs that access to a restored tidal ecosystem would be a benefit to all San Diegans, including members of local Tribal nations. However, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." No revisions to the PEIR are warranted.

I234-9: This comment concludes the comment letter by offering a thank you for consideration. This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is required.

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Comment Letter I235: Ilse Hanning, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: hanning@evervationcustom.com on behalf of [Ilse Hanning](#)
To: [PLU Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 5:04:00 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Ilse Hanning
8458 Mount Vernon St. Lemon Grove, CA 91945-3325

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Comment Letter I236: Linda Heidt, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: lheidt@recreationcustom.com on behalf of Linda Heidt
To: [PJL Flannery/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 5:26:18 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Linda Heidt
1802 Garnet Ave San Diego, CA 92109-3352

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Comment Letter I237: Patricia Heilig, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: pheilig@sierrajordan.com on behalf of PATRICIA HEILIG
To: [PLN Planning/CEOS](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:51:13 PM

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Dear CHQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeiyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
PATRICIA HEILIG
19131 Sierra Majorca Rd. Irvine, CA 92603-3939

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Comment Letter I238: James Hemmick, April 19, 2023

This comment letter is a duplicate of comment letter I143. Please refer to comment letter I143 for responses to this comment letter.

From: [James Hemmick](#)
To: [EIR Planning/CEQA](#)
Subject: [EXTERNAL] Project Recreation in De Anza
Date: Wednesday, April 19, 2023 2:24:50 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

The city's final Environmental Impact Report (EIR) for this project must recognize that there are currently several millions of organized recreation in existing venues each year and millions more hours in casual unorganized recreation in this area. Current recreational facilities are not adequate for the existing needs. The ball fields need rebuilding, the racquet sports facility has no bathrooms and is in need of additional courts. This regional recreational asset has no soccer field, no aquatic center, no skate park and more.

In addition, approximately 8,000 additional residents are being zoned to be added to the Mission Bay Drive Corridor. This corner of Mission Bay Park will need to operate as their neighborhood park. Is this additional population recognized in the plan? Many who live north and east of Highway 5 have expressed a need for Mission Bay Park to be a neighborhood park for their community. However, there is no safe pedestrian or bicycle path of travel to Mission Bay Park. Have these additional demands for park space been analyzed? Approximately 60% of those who camp in the shoreline campsites live in San Diego County and about 90% live in Southern California. Campsites near the water are a major high demand recreational feature that has been part of Mission Bay Park for decades. How will any reduction in public accessibility to low cost overnight stays near the water be mitigated?

If the city De Anza "natural" plan reduces recreational park space how will that be mitigated? If the plan reduces shoreline access how will that be mitigated? If the water area for boating, swimming, kayaking is reduced, how will that loss be mitigated? There is clearly a need for more recreation venues. How can less space devoted for recreation be justified?

There are other areas of potential marshland that should be considered before any disruption of current recreation and parkland is considered. Have any other areas in the region been considered for marshland development? Has marshland at the outfall of Tecolote creek been considered? What are the financial implications of this plan? Fewer campsites mean less revenue to the Mission Bay Park Fund. What is the financial cost of fewer campsites? What are the costs related to building marshland on the West side of Rose Creek? On the east side of Rose Creek?

What are the environmental costs of digging down and removing thousands and thousands of yards of land mass? What is the carbon footprint of that deconstruction? What hazardous toxic wastes are likely to be found and exposed with that amount of land mass disruption? Those who have reviewed various plans have a desire for a balance between education, recreation and the environment. The redevelopment should enhance each and diminish none.

Sent from my iPhone
858.692.1295

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Comment Letter I239: Karla Henderson, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: blidif@beverlyactioncustom.com on behalf of Karla Henderson
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 6:33:53 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Karla Henderson
482 W San Ysidro Blvd # 1206 San Ysidro, CA 92173-2444

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Comment Letter I240: Amber Heredia, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: Amber5000al@servicofonction.com on behalf of Amber Heredia
To: [PLN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:22:16 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Amber Heredia
28 Clifford Ln, Ladera Ranch, CA 92604-1350

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Comment Letter I241: Crystal Hernandez, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: chernandez1771@sevensixtyoncoast.com on behalf of [Crystal Hernandez](#)
To: [PLU Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 5:11:39 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeayay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Crystal Hernandez
9565 Graham St. Cypress, CA 90630-3809

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Comment Letter I242: Paul Hildebrand, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: hildebrand777@sevensystemsonline.com on behalf of Paul Hildebrand
To: [EJL_Flanning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:16:21 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kineyaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Paul Hildebrand
365 Pomelo Dr. Vista, CA 92081-6386

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Comment Letter I243: Nigella Hillgarth, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: nigella.hillgarth@sevensystemson.com on behalf of [Nigella Hillgarth](#)
To: [EJL Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:16:53 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildcat plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildcat proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Nigella Hillgarth
6110 Camino De La Costa, La Jolla, CA 92037-6520

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Comment Letter I244: James Hodgdon, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: James.Hodgdon@sevanactioncenter.com on behalf of James Hodgdon
To: [EIR Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:46:27 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildcat plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildcat proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
James Hodgdon
9185 Oviedo St. San Diego, CA 92129-2134

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Comment Letter I245: Marcia Holcomb, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: marciabolcomb@missionbayecosystem.com on behalf of [Marcia Holcomb](#)
To: [PJL_Flannin@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 8:12:02 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Marcia Holcomb
5500 Via Verano · Yorba Linda, CA 92887-4930

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Comment Letter I246: Diane Hollenbeck, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: diane1967@verizon.com on behalf of Diane Hollenbeck
To: [P.U. Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:51:13 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department:

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds - original members of the 1973 Endangered Species Act - will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kamehau and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Diane Hollenbeck
1282 Lanee Dr Tustin, CA 92780-4541

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Comment Letter I247: Mary Ella Holtam, April 19, 2023

I247

From: [Mary Ella Holtam](#)
To: [PLN_Planning@COA](#)
Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan PEIR*
Date: Wednesday, April 19, 2023 5:01:51 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Hello,
 I wanted to email in support of maximum restored wetlands and Rewild. I believe that the city's draft EIR must prioritize water quality in Mission Bay by adding a specific project objective to "improve the water quality of the study area and the bay through natural, resilient infrastructure". The 1994 Mission Bay Park Master Plan demands it. The draft EIR is also missing details on foreseeable impacts from sea level rise. How can we, the city, or anyone be expected to determine the best land-use plan without knowing how climate change will affect our park? The city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035. The Wildest plan provides the city with one of the best ways to achieve this goal, but the draft EIR for the De Anza Natural plan fails to evaluate its proposals against the city's own Climate Action Plan goals. The city's proposal fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. All San Diegans, including our Kumeyay neighbors and those in underserved communities will benefit with access to a vibrant marsh.
 Thank you for your consideration,
 Mary

I247-1
 I247-2
 I247-3
 I247-4
 I247-5

I247-1: This comment requests that the City of San Diego (City) prioritize the need for maximum wetland restoration. This comment will be provided to decision makers for their consideration. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is warranted.

I247-2: This comment states that the PEIR should include a project objective that prioritizes improving water quality through natural resilient infrastructure. The project objectives listed in PEIR Chapter 3, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Section 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

I247-3: This comment states that the PEIR is missing details on the foreseeable impacts from sea level rise. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland

habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

I247-4: The comment states that the PEIR fails to consider the ReWild Mission Bay “Wildest” proposal in relation to the City’s Climate Action Plan (CAP) restoration goal of 700 acres of restored tidal marsh by 2035.

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. Chapter 8.0 evaluates four alternatives that were selected for additional analysis; in addition, Chapter 8.0 also identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the Re Wild Mission Bay “Wildest” proposal, is provided in Chapter 8.0.

Other restoration areas within the City’s jurisdiction are being considered to meet the goals of the City’s Climate Action Plan (CAP). The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 227 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City’s CAP. As identified in the City’s CAP, one of the

identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

I247-5: This comment states that the PEIR fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem, and that all San Diegans will benefit from access to a vibrant tidal marsh. The City concurs that access to a restored tidal ecosystem would be a benefit to all San Diegans, including members of local Tribal nations. However, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." No revisions to the PEIR are warranted.

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Comment Letter I248: Deborah Honeycutt, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: dbhoneyc@seeryachancustom.com on behalf of Deborah Honeycutt
To: [EIR_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:20:22 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northern corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Deborah Honeycutt

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Deborah Honeycutt
10855 Canarywood Ct. San Diego, CA 92131-2641

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Comment Letter I249: Terrance Hutchinson, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: terrancehutchinson@reventionactioncustom.com on behalf of [Terrance Hutchinson](#)
To: [D.H. Berrino/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 8:58:53 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northern corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kume'ay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Terrance Hutchinson
54600 Shoal Crk La Quinta, CA 92253-4781

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Comment Letter I250: Erin ImHof, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: erin.imhof@severactionssystem.com on behalf of Erin ImHof
To: [EJL Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:01:14 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildrest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildrest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Erin ImHof
26072 Amacapa St Laguna Hills, CA 92653-6272

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Comment Letter I251: Craig Jackson, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: Craig.M.JacksonSD@seawestactioncenter.com on behalf of [Craig M. Jackson](#)
To: [D.H. Fleming@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:47:04 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CBQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2055, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds - original members of the 1973 Endangered Species Act - will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kamehameha and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Craig M Jackson
5931 Seacrest View Rd San Diego, CA 92121-4355

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Comment Letter I252: Alexis Jacovides, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: alexis1003@rewildmissionbay.com on behalf of [Alexis Jacovides](#)
To: [Sandy Scott](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 4:53:57 PM

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Dear Scott Sandy,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyan and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Alexis Jacovides
27312 Via Amato, Mission Viejo, CA 92692-2411

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Comment Letter I253: Padma Jagannathan, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: paddy.jagan@everyactioncustom.com <paddy.jagan@everyactioncustom.com>
Sent: Wednesday, April 19, 2023 9:14 AM
To: Sandel, Scott <SSandel@sanidiego.gov>
Subject: [EXTERNAL:] De Anza Natural Wetland Restoration Plan

**** This email came from an external source. Be cautious about clicking on any links in this email or opening attachments. ****

Dear Scott Sandel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildrest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildrest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Trost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. All San Diegans, including our Kimmeyway neighbors and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Padma Jagannathan
10524 Abalone Landing Ter San Diego, CA 92130-8710

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Comment Letter I254: Diane Jaynes, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: djaynes@everyactioncustom.com <djaynes@everyactioncustom.com>
Sent: Wednesday, April 19, 2023 10:38 AM
To: Sandel, Scott <SSandel@sanidiego.gov>
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Scott Sandel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. All San Diegans, including our Kumeyaay neighbors and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Diane Jaynes
4034 Crown Point Dr. San Diego, CA 92109-6201

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Comment Letter I255: Elliot Jones, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: elliottjones@recreationssystem.com on behalf of Elliot Jones
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 2:32:51 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kameyuu and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Elliot Jones
4319 Mentone St. San Diego, CA 92107-1119

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Comment Letter I256: Joshua Jones, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: chanbest@sevensixaction.com on behalf of Joshua Jones
To: [EJL Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:51:03 AM

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Dear CEQA Planning Department,

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Joshua Jones
5871 Stresemann St. San Diego, CA 92122-3140

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Comment Letter I257: Linda K, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: lskour@sevenspeciestrust.com on behalf of Linda K
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 10:39:52 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kameyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Linda K
4110 Jewell St San Diego, CA 92109-5486

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Comment Letter I258: Chad Kapusta, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: kapusta.chad@severingtons.com on behalf of Chad Kapusta
To: DN_Sharing@CEQA
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:00:59 PM

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Dear CEQA Planning Department,

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Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Chad Kapusta
1380 Shadowridge Dr Apt 157 Vista, CA 92081-9036

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Comment Letter I259: Lise Kastigar, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: liskastigar@cityofsanjose.com on behalf of [Lise Kastigar](#)
To: [Sardel, Scott](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:39:50 PM

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Dear Scott Sardel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeayay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Lise Kastigar
22972 Mirabel Dr. Laguna Niguel, CA 92677-2720

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Comment Letter I260: Murray Kaufman, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: murray.kaufman20@externalcostars.com on behalf of Murray Kaufman
To: [D.H. Fleming@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 5:35:19 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

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The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kamehameha and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Murray Kaufman
22 Acacia Tree Ln | Irvine, CA 92612-2201

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Comment Letter I261: Gary Kent, April 19, 2023

I261

From: Gary Kent
To: E.N. Planning/COG
Subject: [EXTERNAL] Protect Recreation in De Anza
Date: Wednesday, April 19, 2023 1:53:57 PM
Attachments: Email signature line 2022 - Gary updated.png

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Hello...

I261-1

While I didn't actually write the words below, I agree with them 100%...

I261-2

The city's final Environmental Impact Report (EIR) for this project must recognize that there are currently several millions of organized recreation in existing venues each year and millions more hours in casual unorganized recreation in this area. Current recreational facilities are not adequate for the existing needs. The ball fields need rebuilding, the racquet sports facility has no bathrooms and is in need of additional courts. This regional recreational asset has no soccer field, no aquatic center, no skate park and more.

I261-3

In addition, approximately 8,000 additional residents are being zoned to be added to the Mission Bay Drive Corridor. This corner of Mission Bay Park will need to operate as their neighborhood park. Is this additional population recognized in the plan? Many who live across and east of Highway 5 have expressed a need for Mission Bay Park to be a neighborhood park for their community. However, there is no safe pedestrian or bicycle path of travel to Mission Bay Park. Have these additional demands for park space been analyzed? Approximately 60% of those who camp in the shoreline campsites live in San Diego County and about 90% live in Southern California. Campsites near the water are a major high demand recreational feature that has been part of Mission Bay Park for decades. How will any reduction in public accessibility to low cost overnight stays near the water be mitigated?

I261-4

If the city De Anza "natural" plan reduces recreational park space how will that be mitigated? If the plan reduces shoreline access how will that be mitigated? If the water area for boating, swimming, kayaking is reduced, how will that loss be mitigated? There is clearly a need for more recreation venues. How can less space devoted for recreation be justified?

I261-5

There are other areas of potential marshland that should be considered before any disruption of current recreation and parkland is considered. Have any other areas in the region been considered for marshland development? Has marshland at the outfall of Tecolote creek been considered? What are the financial implications of this plan? Fewer campsites mean less revenue to the Mission Bay Park Fund. What is the financial cost of fewer campsites? What are the costs related to building marshland on the West side of Rose Creek? On the east side of Rose Creek?

I261-6

What are the environmental costs of digging down and removing thousands and thousands of yards of land mass? What is the carbon footprint of that deconstruction? What hazardous toxic wastes are likely to be found and exposed with that amount of land mass disruption?

I261-7

Those who have reviewed various plans have a desire for a balance between education, recreation and the environment. The redevelopment should enhance each and diminish none.

All the best,

I261-1: This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Program Environmental Impact Report (PEIR) for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). Therefore, no further response is warranted.

I261-2: This comment states that the PEIR should recognize the organized and unorganized recreation events in the area and the inadequacy of existing facilities. PEIR Chapter 2.0, Environmental Setting, establishes the analyzed project area. PEIR Section 2.3.1.1, Existing Land Uses, identifies the existing uses of the project area, including regional parkland and active recreation uses such as the Mission Bay Golf Course and Practice Center operated and managed by the City of San Diego (City), the Pacific Beach Playing Fields (also known as the Bob McEvoy Field Complex) currently used by the Mission Bay Little League and Pacific Youth Soccer League, the Mission Bay Boat and Ski Club, and tennis courts and clubhouse currently used by the Pacific Beach Tennis Club. The existing uses form the baseline from which the PEIR evaluates the impacts of the project at the program level. Improvements to current facilities may be implemented as future projects come forward. Future projects will be subject to the City's General Development Plan process to ensure that all requirements are met before they are approved. This comment does not address the adequacy or accuracy of the PEIR, and no further response is warranted.

I261-3: This comment inquires if the additional population in the area was recognized in the project. As discussed in PEIR Section 7.2.5, Population and Housing, the project would not introduce additional residents to the area or substantial population growth in the area either directly or indirectly. In accordance with CEQA, future residential development projects would be required to analyze the increase in demand for public park and recreation facilities and their physical impact on those facilities. Those future projects would be required to mitigate for any significant impacts to recreational facilities.

This comment further states that residents across Interstate 5 expressed desire for a neighborhood park in the Mission Bay area but have no safe pedestrian or bicycle path. The project would provide improved pedestrian and bicycle infrastructure to connect the active recreation uses on site to the surrounding community through connections to existing facilities, including the Class II bike lanes along Grand Avenue and Class III bike routes along North Mission Bay Drive. No revisions to the PEIR are warranted.

I261-4: This comment states that the project would reduce low-cost campsites, park space, and shoreline access and asks how these reductions would be mitigated. The project would replace much of the low-cost visitor guest accommodations offered by Campland on the Bay (Campland) and Mission Bay RV Resort by providing 48.5 acres of new low-cost visitor guest accommodations, which would include land use for recreational vehicles, cabins, or other eco-friendly accommodations. The project also includes active and passive recreational amenities to include but not be limited to sand volleyball, pickleball, tennis, walking, cycling, athletic fields, and

inline/roller skating and a sandy beach area at the northern and western edges of De Anza Cove. The project would improve access to the park areas along the bay shoreline for residents and visitors. As described in PEIR Chapter 3.0, Project Description, the project would provide a waterfront multi-use path that would provide users with shore access and would connect the project area to points to the north, west, and east to enhance public equitable access and increase connections to the surrounding communities. The multi-use path would be a feature for users to view the marshes and have distant views of Mission Bay. In addition, areas designated as Regional Parkland would include passive recreation amenities such as overlooks, pathways, and picnic areas. Finally, PEIR Figure 3-1, Site Plan, and PEIR Table 3-2, Proposed Land Use Acreages, have been revised in the Final PEIR to reflect a no net loss of active recreation use acreage compared to the existing condition.

A boat facility and shared clubhouse would be sited on the northern shore of De Anza Cove and would provide watercraft access on De Anza Cove. In addition, no changes are proposed for the existing boat ramp southeast of the project area that is easily accessed from Interstate 5. A sandy beach area at the northern and western edges of De Anza Cove would be adjacent to the low-cost visitor guest accommodations use and the boating use. The project would provide a range of recreational features consistent with the Mission Bay Park Master Plan (MBPMP).

I261-5: The comment asks if other areas of potential tidal marshland, including Tecolote Creek, have been considered. The proposed project is the De Anza Natural Amendment to the MBPMP. As stated in response to comment I261-2, PEIR

Chapter 2.0 establishes the analyzed project area, which is identified as the northeastern corner of the Mission Bay Park. The project focuses on habitat enhancements within the boundaries of the project area as outlined in PEIR Chapter 2.0. Tecolote Creek is outside the project area boundary.

Other restoration areas within the City's jurisdiction are being considered to meet the goals of the City's Climate Action Plan (CAP). The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 225.1 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City-managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreages.

The comment further asks about construction costs associated with implementation of the project, financial costs of fewer campsites, and costs associated with building marshland on the western and eastern sides of Rose Creek. CEQA Guidelines, Section 15131, specifically states that "economic or social effects of a project shall not be treated as significant effects on the environment." CEQA defines "environment" as "the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise,

objects of historic or aesthetic significance” (California Public Resources Code, Section 21060.5). An EIR project analysis is limited to those socioeconomic issues that could result in a direct change to the physical environment. Therefore, the economic cost of the project is not required to be analyzed in the PEIR. No revisions to the PEIR are warranted.

I261-6: The comment asks about the environmental costs associated with digging and removing yards of land mass. The PEIR was prepared to identify the environmental impacts associated with implementation of the project, including proposed construction grading. As discussed in PEIR Chapter 3.0, no development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. As described in PEIR Section 1.4.1, Type of PEIR, General Development Plans would be developed over time and would provide precise engineering and construction plans for the recreational elements of the project.

However, as further discussed in PEIR Chapter 3.0, the proposed habitat area improvements would involve the conversion of the existing Campland property to natural habitat area, as anticipated in the MBPMP. This would involve the demolition of the developed area within Campland, including structures, pavement, and utilities, and demolition of the adjacent boat docks to the south. It would also involve backfilling portions of the bay south of the proposed marsh and southwest of the proposed low-cost visitor guest accommodations area. Grading related to construction of the project is estimated to be balanced on site with approximately 873,886 cubic yards of overall cut and fill. PEIR Table S-4, Summary of Significant

Environmental Impacts, provides a summary of the environmental impacts associated with the project and mitigation measures proposed to reduce those impacts. Therefore, the PEIR adequately analyzes the impacts of project construction, including grading activities. No revisions to the PEIR are warranted.

This comment further asks about the carbon footprint associated with the proposed grading activities and inquires as to what toxic wastes would be found during project construction. PEIR Section 5.4, Greenhouse Gas Emissions, analyzes the potential impacts related to greenhouse gas (GHG) emissions that could result from the implementation of the project. The PEIR concludes that temporary project construction emissions were included in the City's CAP GHG emissions inventory and business-as-usual GHG emissions projections; therefore, they were accounted for in the City's CAP. Thus, compliance with the City's CAP Consistency Regulations upon implementation of the project would result in less than significant impacts associated with GHG emissions. Therefore, the PEIR adequately analyzes the GHG impacts of project construction, including grading activities. No revisions to the PEIR are warranted.

Furthermore, PEIR Section 5.5, Hazards and Hazardous Materials, analyzes potential impacts related to hazards and hazardous materials, including public health and safety, that could result from the implementation of the project. The Phase I Environmental Site Assessment Technical Memorandum (PEIR Appendix F) was conducted for the project area and included a review of historical source information, a search of regulatory agency databases within specified distances of the subject property, review of

available local agency records, interviews, and site reconnaissance. The PEIR concludes that construction of the project could encounter contaminated soils during grading and excavation, which could result in adverse hazards and hazardous materials impacts to on-site construction/grading personnel and cross-contamination of soils if contaminated soil is placed as fill in currently uncontaminated areas. The project would be required to implement Mitigation Measures MM HAZ 5.5-1 through MM HAZ 5.5-4 to reduce impacts. Therefore, the PEIR adequately analyzes the hazards and hazardous materials impacts of the project. No revisions to the PEIR are warranted.

I261-7: This comment requests consideration for a balance between education, recreation, and the environment. The MBPMP calls for a “balanced approach” with three components: recreation, commerce, and environment. This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the PEIR. Therefore, no further response is warranted.

Gary

Gary Kent

"The Agent You See EVERYWHERE"



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Comment Letter I262: Richel Khoury, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: richel@recreationcustom.com on behalf of [richel.khoury](#)
To: [SUN Planning/CEN](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:01:21 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CBOA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds - original members of the 1973 Endangered Species Act - will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeayay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
richel.khoury
3990 Old Town Ave Ste C100 San Diego, CA 92110-2968

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Comment Letter I263: Richel Khoury, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: richel@servjuchonicsism.com on behalf of [richel khoury](#)
To: [PH_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:05:46 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
richel khoury
1001 Center St. La Jolla, CA 92037-5500

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Comment Letter I264: Christine Kim, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: christinekim@severactioncustom.com on behalf of Christine Kim
To: [D.H. Fleming/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:50:00 PM

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Dear CBQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2055, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds - original members of the 1973 Endangered Species Act - will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kamehameha and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Christine Kim
2509 Camino Del Sol Fullerton, CA 92833-4826

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Comment Letter I265: Gale Kirk, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: palek@188everyactionis.com on behalf of Gale Kirk
To: PLU_Planning@CEQA
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:40:28 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,

Gale Kirk
20242 Bayview Ave Newport Beach, CA 92660-0708

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Comment Letter I266: Adrienne Kirkeby, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: sak27@cityofsanantonio.com on behalf of [Adrienne Kirkeby](#)
To: [PLAN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 4:40:52 PM

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Dear CBOA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

As a former San Diegan and nature lover, I was happy to see that the City has created the De Anza Natural Wetland Restoration Plan. Here are some considerations that came to my attention.

1. In San Diego's final Environmental Impact Report (EIR) for this project please add plan objective to prioritize water quality by restoring wetlands.
2. The De Anza plan is also missing details on the impacts of sea level rise. While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration.
3. According to Audubon, Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. These birds – original members of the 1973 Endangered Species Act – are in danger of losing their habitat over the next several decades as sea levels rise and their habitat is inundated unless the marsh is preserved.

Please know, I appreciate the work you have already done here to preserve the Mission Bay area. As we all know, it is a treasure that cannot be replaced, once lost.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Adrienne Kirkeby
401 S El Cielo Rd. Palm Springs, CA 92262-7913

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Comment Letter I267: Carl Kish, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: ckish4058@everyactioncustom.com <ckish4058@everyactioncustom.com>
Sent: Wednesday, April 19, 2023 9:07 AM
To: Sandel, Scott <SSandel@sanidiego.gov>
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan

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Dear Scott Sandel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. All San Diegans, including our Kameyaaq neighbors and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Carl Kish
4826 Ulah St San Diego, CA 92116-1425

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Comment Letter I268: Barbara Klein-Robuck, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: barbarakr@everysolutions.com on behalf of Barbara Klein-Robuck
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:37:00 AM

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Dear CEQA Planning Department:

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds - original members of the 1973 Endangered Species Act - will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeiyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Barbara Klein-Robuck
2703 Ortega Hwy Spc 39 San Juan Capistrano, CA 92675-1958

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Comment Letter I269: Russell Knipp, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: RussKnipp@severyscientific.com on behalf of [Russell Knipp](#)
To: [PH_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:42:27 AM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Russell Knipp
3906 S Timber St. Santa Ana, CA 92707-4953

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Comment Letter I270: John Knox, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: johnknox61@sewaactioncustom.com on behalf of John Knox
To: [EIJ Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 3:24:22 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildcat plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildcat proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
John Knox
434 Avenida Gabriel Chula Vista, CA 91914-4463

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Comment Letter I271: Deborah Koken, April 19, 2023

I271

From: dkoken@servactioncustom.com on behalf of Deborah Koken
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:23:46 PM

** This email came from an external source. Be cautious about clicking on any links in this email or opening attachments. **

Dear CEQA Planning Department,

- I271-1 | As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.
 - I271-2 | Please ensure that the city's final Environmental Impact Report (EIR) for this project prioritizes water quality by making the water quality of the study area and the bay a specific project objective. As you know, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.
 - I271-3 | The city's draft EIR for the De Anza plan is missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect the park? The city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, and the ReWild Mission Bay Wildrest plan is the best way to achieve this goal. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildrest proposal despite the city's own Climate Action Plan goals.
 - I271-4 |
 - I271-5 | Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. This habitat will be lost over the next several decades as sea levels rise. If we begin the ReWilding process now, these and other threatened and endangered native species can be saved.
 - I271-6 | The draft proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem which could ensure that everyone, especially the Kuleyaaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.
 - I271-7 | Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.
- Sincerely,
 Deborah Koken
 1778 Kenwood Pl Costa Mesa, CA 92627-3621

I271-1: This comment requests that the City of San Diego (City) prioritize the need for maximum wetland restoration. This comment will be provided to decision makers for their consideration. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is warranted.

I271-2: This comment states that the PEIR should include a project objective that prioritizes improving water quality through natural resilient infrastructure. The project objectives listed in PEIR Chapter 3, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Section 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

I271-3: This comment states that the PEIR is missing details on the foreseeable impacts from sea level rise. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for

the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

I271-4: The comment states that the PEIR fails to consider the ReWild Mission Bay “Wildest” proposal in relation to the City’s Climate Action Plan (CAP) restoration goal of 700 acres of restored tidal marsh by 2035.

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. Chapter 8.0 evaluates four alternatives that were selected for additional analysis; in addition, Chapter 8.0 also identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the Re Wild Mission Bay “Wildest” proposal, is provided in Chapter 8.0.

Other restoration areas within the City’s jurisdiction are being considered to meet the goals of the City’s Climate Action Plan (CAP). The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 227 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified

in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

I271-5: This comment states that the endangered Ridgway's rail and other threatened and endangered native species will lose their habitat as sea levels rise and will be lost if the rewilding process is not started now. A project-specific Sea Level Rise Study has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The project would expand habitat areas, resulting in long-term benefits to wetland habitat; species, including the endangered Ridgway's rail; and the functions and values of the aquatic resources. No further revisions to the PEIR are warranted.

I271-6: This comment states that the PEIR fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem, and that all San Diegans will benefit from access to a vibrant tidal marsh. The City concurs that access to a restored tidal ecosystem would be a benefit to all San Diegans, including members of local Tribal nations. However, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." No revisions to the PEIR are warranted.

I271-7: This comment concludes the comment letter by offering a thank you for consideration. This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is required.

Comment Letter I272: Vicki Kopinski, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: vkopinski@cityactioncenter.com on behalf of [Vicki Kopinski](#)
To: [CEQA Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 2:08:21 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by aiding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildcat plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildcat proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Vicki Kopinski
26380 Hayden Ln Menifee, CA 92584-9446

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Comment Letter I273: Kelly Kramer, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: kellykramer@evervationcustom.com on behalf of Kelly Kramer
To: [PH_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 4:45:07 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Kelly Kramer
11431 Kathy Ln Garden Grove, CA 92840-1716

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Comment Letter I274: Laura Kramer, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: laurakramer01@seeyachoiceaction.com on behalf of Laura Kramer
To: [PH Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 7:43:28 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise: How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Laura Kramer
73413 Bockboard Trl, Palm Desert, CA 92260-6617

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Comment Letter I275: Kyoko Kremp, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: kyokokremp2@earthactionist.com on behalf of [Kyoko Kremp](#)
To: [EJL_Planning@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 5:33:05 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds—original members of the 1973 Endangered Species Act—will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Kyoko Kremp
24912 Sunset Pl E, Laguna Hills, CA 92653-4802

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Comment Letter I276: Laszlo Kurucz, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: laszlo.kurucz@sewrastocustom.com on behalf of Laszlo Kurucz
To: [Eli Blanning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 7:04:07 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wetland plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wetland proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Laszlo Kurucz
26571 Normundale Dr Lake Forest, CA 92630-6731

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Comment Letter I277: Rochelle La Frinere, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: rochelle.lafrinere@seynactionsonastrom.com on behalf of Rochelle La Frinere
To: [PLAN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:33:54 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kamehameha and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Rochelle La Frinere
783 Goetsch St. San Diego, CA 92114-6723

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Comment Letter I278: Georgia Labey, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: georgia.labey@everectocorps.com on behalf of Georgia Labey
To: [P.U. Flannery/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:08:53 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise: How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Georgia Labey
775915 Avenue Of The States Apt 606 Palm Desert, CA 92211-8403

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Comment Letter I279: David Laguardia, April 19, 2023

This comment letter is a duplicate of comment letter I143. Please refer to comment letter I143 for responses to this comment letter.

From: [David Laguardia](#)
To: [Eli Ramirez, CEO](#)
Subject: [EXTERNAL] Project Recreation in De Anza
Date: Wednesday, April 19, 2023 2:31:39 PM

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The city's final Environmental Impact Report (EIR) for this project must recognize that there are currently several millions of organized recreation in existing venues each year and millions more hours in casual unorganized recreation in this area. Current recreational facilities are not adequate for the existing needs. The ball fields need rebuilding, the racquet sports facility has no bathrooms and is in need of additional courts. This regional recreational asset has no soccer field, no aquatic center, no skate park and more. In addition, approximately 8,000 additional residents are being zoned to be added to the Mission Bay Drive Corridor. This corner of Mission Bay Park will need to operate as their neighborhood park. Is this additional population recognized in the plan? Many who live across and east of Highway 5 have expressed a need for Mission Bay Park to be a neighborhood park for their community. However, there is no safe pedestrian or bicycle path of travel to Mission Bay Park. Have these additional demands for park space been analyzed? Approximately 60% of those who camp in the shoreline campsites live in San Diego County and about 90% live in Southern California. Campsites near the water are a major high demand recreational feature that has been part of Mission Bay Park for decades. How will any reduction in public accessibility to low cost overnight stays near the water be mitigated? If the city De Anza "natural" plan reduces recreational park space how will that be mitigated? If the plan reduces shoreline access how will that be mitigated? If the water area for boating, swimming, kayaking is reduced, how will that loss be mitigated? There is clearly a need for more recreation venues. How can less space devoted for recreation be justified? There are other areas of potential marshland that should be considered before any disruption of current recreation and parkland is considered. Have any other areas in the region been considered for marshland development? Has marshland at the outfall of Tecolote creek been considered? What are the financial implications of this plan? Fewer campsites mean less revenue to the Mission Bay Park Fund. What is the financial cost of fewer campsites? What are the costs related to building marshland on the West side of Rose Creek? On the east side of Rose Creek? What are the environmental costs of digging down and removing thousands and thousands of yards of land mass? What is the carbon footprint of that deconstruction? What hazardous toxic wastes are likely to be found and exposed with that amount of land mass disruption? Those who have reviewed various plans have a desire for a balance between education, recreation and the environment. The redevelopment should enhance each and diminish none.

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Comment Letter I280: Deborah Lancman, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: lucy.lan@cityofmesa.com on behalf of [deborah.lancman](#)
To: [Sandel, Scott](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:37:02 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Scott Sandel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
deborah.lancman
10028 Resmar Pl, La Mesa, CA 91941-6923

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Comment Letter I281: Diane Lane, April 19, 2023

I281

From: diane4785@severactioncustom.com on behalf of [Dianne Lane](#)
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 2:13:40 PM

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Dear CEQA Planning Department,

I281-1 As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

I281-2 There is no Plan B.

I281-3 The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

I281-4 The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

I281-6 The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

I281-7 The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeayay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

I281-8 Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Dianne Lane
3509 Udall St. San Diego, CA 92106-1648

I281-1: This comment requests that the City of San Diego (City) prioritize the need for maximum wetland restoration. This comment will be provided to decision makers for their consideration. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is required.

I281-2: This comment states that there is no Plan B. It is unclear what the comment is referring to. Therefore, no further response is warranted.

I281-3: This comment states that the PEIR should include a project objective that prioritizes improving water quality through natural resilient infrastructure. The project objectives listed in PEIR Chapter 3, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Section 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

I281-4: This comment states that the PEIR is missing details on the foreseeable impacts from sea level rise. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise

Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

I281-5: The comment states that the PEIR fails to consider the ReWild Mission Bay “Wildest” proposal in relation to the City’s Climate Action Plan (CAP) restoration goal of 700 acres of restored tidal marsh by 2035.

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. Chapter 8.0 evaluates four alternatives that were selected for additional analysis; in addition, Chapter 8.0 also identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the Re Wild Mission Bay “Wildest” proposal, is provided in Chapter 8.0.

Other restoration areas within the City’s jurisdiction are being considered to meet the goals of the City’s Climate Action Plan (CAP). The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat.

The project proposes to enhance 227 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

I281-6: This comment states that the endangered Ridgway's rail and other threatened and endangered native species will lose their habitat as sea levels rise and will be lost if the rewilding process is not started now. A project-specific Sea Level Rise Study has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The project would expand habitat areas, resulting in long-term benefits to wetland habitat; species, including the endangered Ridgway's rail; and the functions and values of the aquatic resources. No further revisions to the PEIR are warranted.

I281-7: This comment states that the PEIR fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem, and that all San Diegans will benefit from access to a vibrant tidal marsh. The City concurs that access to a restored tidal ecosystem would be a benefit to all San Diegans, including members of local Tribal nations. However, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the

project, and to indicate the manner in which those significant effects can be mitigated or avoided." No revisions to the PEIR are warranted.

I281-8: This comment concludes the comment letter by offering a thank you for consideration. This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is required.

Comment Letter I282: Victoria Lea, April 19, 2023

I282

From: lea.victoria@everyanoracustom.com on behalf of Victoria Lea
To: [BIA Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 10:00:38 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

I282-1 As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

I282-2 We need YOUR help! Please raise priority level for the birds that warn us of our fate.

I282-3 The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

I282-4 The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildcat plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildcat proposal against the city's own Climate Action Plan goals.

I282-5

I282-6 The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rail. Yet these birds—original members of the 1973 Endangered Species Act—will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

I282-7 The city's proposal also fails to analyze the recreational and cultural opportunities of reconnecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeiway and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

I282-8 Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
 Victoria Lea
 5357 La Jolla Blvd Unit 30 La Jolla, CA 92037-7954

I282-1: This comment requests that the City of San Diego (City) prioritize the need for maximum wetland restoration. This comment will be provided to decision makers for their consideration. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is warranted.

I282-2: This comment requests that the priority level for the birds that warn us of our fate be raised. This comment does not address the adequacy or accuracy of the PEIR for the proposed project, and no further response is warranted.

I282-3: This comment states that the PEIR should include a project objective that prioritizes improving water quality through natural resilient infrastructure. The project objectives listed in PEIR Chapter 3.0, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Section 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

I282-4: This comment states that the PEIR is missing details on the foreseeable impacts from sea level rise. A project-specific Sea Level Rise Assessment Technical Report has been

prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

- I282-5:** The comment states that the PEIR fails to consider the ReWild Mission Bay “Wildest” proposal in relation to the City’s Climate Action Plan (CAP) restoration goal of 700 acres of restored tidal marsh by 2035.

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. Chapter 8.0 evaluates four alternatives that were selected for additional analysis; in addition, Chapter 8.0 also identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the Re-Wild Mission Bay “Wildest” proposal, is provided in Chapter 8.0.

Other restoration areas within the City’s jurisdiction are being considered to meet the goals of the City’s Climate Action Plan (CAP). The goal of CAP Measure 5.1,

Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 227 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

I282-6: This comment states that the endangered light-footed Ridgway's rail and other threatened and endangered native species will be lost if the rewilding process is not started now. A project-specific Sea Level Rise Study has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The project would expand habitat areas, resulting in long-term benefits to wetland habitat; species, including the endangered Ridgway's rail; and the functions and values of the aquatic resources. No further revisions to the PEIR are warranted.

I282-7: This comment states that the PEIR fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem, and that all San Diegans will benefit from access to a vibrant tidal marsh. The City concurs that access to a restored tidal ecosystem would be a benefit to all San Diegans, including members of local Tribal nations. However, as stated in

CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." No revisions to the PEIR are warranted.

I282-8: This comment concludes the comment letter by offering a thank you for consideration. This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is warranted.

Comment Letter I283: Enora Lecuyer, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: enora.lecuyer1@sevensixtyseven.com on behalf of Enora Lecuyer
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 2:17:55 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds - original members of the 1973 Endangered Species Act - will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Enora Lecuyer
27662 Aliso Creek Rd Apt 6213 Aliso Viejo, CA 92656-5800

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Comment Letter I284: Kathy Lee, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: kryalee@seeyactioncustom.com on behalf of Kathy Lee
To: [EIJL Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:09:51 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northern corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kinneryay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Kathy Lee
973 Grove Pl, Costa Mesa, CA 92627-1001

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Comment Letter I285: Tiana Lee, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: cttelivitz43@evergreenconsulting.com on behalf of Tiana Lee
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 7:06:08 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildcat plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildcat proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Tiana Lee
5700 W Wilson St. Banning, CA 92220-3103

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Comment Letter I286: Steve Leffler, April 19, 2023

I286

From: steve.leffler@san-diego.org
 To: [B.N. Planning/CEQA](#)
 Cc: [Suzanne Scott](#)
 Subject: [EXTERNAL] De Anza Natural Amendment to the Mission Bay Park Master Plan PEIR
 Date: Wednesday, April 19, 2023 4:46:25 PM

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To Whom It May Concern,

Comments on the De Anza Natural Amendment Draft PEIR:

I286-1
 I286-2
 I286-3
 I286-4
 I286-5

1. The City Council approved, in 2019, the addition of 9100 dwelling units at two trolley stations that are in very close proximity to Mission Bay Park: Balboa and Morena. With this increased density, the rationale for maintaining and expanding active recreation in Mission Bay Park is very important. The PEIR should account for increased public access to the active recreation area and recommend **expanded and enhanced** facilities for both field and court sports within the projected active recreation area (reduced 5 acres from the currently available area). Access to active recreation is an important consideration for a healthy lifestyle for both children and adults. Given the rapid growth of racquet sports, the tennis club should be expanded to the extent possible when relocated/rebuilt.
2. The PEIR should recommend that public transportation services (bus stops, etc.) be available close to the active recreation and wetland locations to reduce vehicle trips and improve accessibility.
3. The PEIR should recommend that field and court lighting be converted to LED illumination and that solar panels and possibly battery storage be employed to mitigate the greenhouse gas impact of the active recreation areas and wetlands activities.
4. The PEIR should recommend that public parking should include electric vehicle charging stations to encourage the use of non-polluting vehicles.
5. The PEIR should recommend that buildings or structures be designed or modified to minimize the number of bird strikes.

Steve Leffler
 San Diego District Tennis Association

I286-1: The comment states that the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) should account for increased public access to the active recreation area and should recommend expanded and enhanced facilities for both field and court sports within the projected active recreation area (reduced 5 acres from the currently available area). PEIR Figure 3-1, Site Plan, and PEIR Table 3-2, Proposed Land Use Acreages, have been revised in the Final PEIR to reflect a no net loss of acreage for active recreation uses. The City of San Diego (City) will strive to design and phase future development in a manner that minimizes disruption to active recreation access. Any necessary buffer zones and other land uses proposed on existing recreation facilities would be implemented after these facilities have been modified, moved, or replaced for continued use unless imminent climate hazards necessitate more immediate mitigation. No revisions to the PEIR are warranted.

I286-2: This comment states that the PEIR should recommend that public transportation services (bus stops, etc.) be available close to the active recreation and wetland locations to reduce vehicle trips and improve accessibility. As discussed in PEIR Section 5.10, Transportation and Circulation, the project would include multi-use pathways for pedestrians and bicyclists that would provide connections to existing public transit facilities. The Balboa Avenue Station, approximately 0.25 mile northeast of the project area, and the Clairemont Drive Station, approximately 0.75 mile southeast of the project area,

would provide region-serving high-quality light-rail transit to the project area. In addition, the project would reduce overall development density in the project area, which would decrease vehicle trips compared to the current baseline condition. No revisions to the PEIR are warranted.

I286-3: This comment states that the PEIR should recommend that field and court lighting be converted to LED illumination and that solar panels and possibly battery storage be employed to mitigate the greenhouse gas (GHG) emissions impact of the active recreation areas and wetlands activities. PEIR Section 5.4, Greenhouse Gas Emissions, analyzes the potential impacts related to GHG emissions that could result from the implementation of the project. PEIR Section 5.4 concludes that any increase in GHG emissions associated with the construction and operation of the proposed project were included in the Climate Action Plan (CAP) GHG emissions inventory and business-as-usual GHG emissions projections prepared for the 2022 CAP. Temporary project construction emissions were included in the CAP GHG emissions inventory and business-as-usual GHG emissions projections and, thus, were accounted for in the CAP. Most new discretionary and ministerial development, as specified in the CAP Consistency Regulations, would be required to comply with the CAP Consistency Regulations, which contain measures that are required to be implemented on a project-by-project basis to ensure that the GHG emissions reduction targets identified in the CAP are achieved. Therefore, compliance with CAP Consistency Regulations upon implementation of the proposed project would result in less than significant

impacts associated with GHG emissions. Therefore, no mitigation measures are required.

I286-4: This comments states that the PEIR should recommend that public parking include electric vehicle charging stations to encourage the use of non-polluting vehicles. The City appreciates this recommendation; however, this recommendation would be more appropriate to submit for consideration during future project-level review. This comment does not address the adequacy or accuracy of the PEIR. No further response is warranted.

I286-5: This comment states that the PEIR should recommend that buildings or structures be designed or modified to minimize the number of bird strikes. The City appreciates this recommendation; however, this recommendation would be more appropriate to submit for consideration during future project-level review. This comment does not address the adequacy or accuracy of the PEIR. No further response is warranted.

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Comment Letter I287: Lacey Levitt, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: laceylevitt@severactioncenter.com on behalf of [Lacey Levitt](#)
To: [D.H. Fleming/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:58:07 AM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds - original members of the 1973 Endangered Species Act - will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance. This will ensure that everyone, especially the Kumeayay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind considerations of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Lacey Levitt
6034 Lancaster Dr. San Diego, CA 92120-4537

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Comment Letter I288: Jean Linder, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: jlinder@severactioncustom.com on behalf of [Jean Linder](#)
To: [PJ Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 11:56:28 AM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

Please be mindful that rising sea levels need to be considered in any future plans. The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kamehameha and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Jean Linder
2707 Huananui Ave. San Diego, CA 92117-1633

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Comment Letter I289: Florence Litton, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: flitton@ecology.com on behalf of Florence Litton
To: [Sandel, Scott](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 3:08:49 PM

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Dear Scott Sandel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Florence Litton
15712 Woods Valley Rd. Valley Center, CA 92082-7317

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Comment Letter I290: Ruth Logan, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: rllogan0920@cityofsan-diego.com on behalf of Ruth Logan
To: PLN_Shannon@CEQA
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 9:47:51 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildset plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildset proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Ruth Logan
4665 36th St. San Diego, CA 92116-3651

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Comment Letter I291: John Lomac, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: john@severactioncustom.com on behalf of John Lomac
To: [D.H. Fleming/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 9:33:04 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds - original members of the 1973 Endangered Species Act - will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
John Lomac
832 W Montecito Way San Diego, CA 92103-1814

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Comment Letter I292: Barry Lovinger, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: LovingerB@searvacationssystem.com on behalf of Barry Lovinger
To: [Sandel, Scott](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:06:49 PM

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Dear Scott Sandel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2055, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds - original members of the 1973 Endangered Species Act - will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Klamayan and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Barry Lovinger
17132 Regulus Dr. Yorba Linda, CA 92886-3624

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Comment Letter I293: Carl Luhring, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: carl.luhring@cityofmissionbay.com on behalf of CARL LUHRING
To: [Sandel, Scott](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:00:03 PM

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Dear Scott Sandel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds - original members of the 1973 Endangered Species Act - will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
CARL LUHRING
376 Ferrara Way Vista, CA 92083-4804

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Comment Letter I294: Erin Luke, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: erin.luke@severyston.com on behalf of Erin Luke
To: DN_Planning@CEQA
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 8:19:15 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kananayaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Erin Luke
5980 Dandridge Ln Unit 204 San Diego, CA 92115-6581

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Comment Letter I295: Helen Lynn, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: helen511@evanactioncustom.com on behalf of Helen Lynn
To: [D.H. Blainino/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:23:08 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northern corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Helen Lynn
577 S Thornhill Rd Apt 4 Palm Springs, CA 92264-7884

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Comment Letter I296: Yolanda Mariscal, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: yoli_mariscal@severactionsofsterior.com on behalf of Yolanda Mariscal
To: [EIJ Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 4:04:22 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kiteeayay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Yolanda Mariscal
5463 Twin Lakes Dr Cypress, CA 90630-5956

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Comment Letter I297: Sheryl Marsh, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: missi@seawatchwatersystem.com on behalf of [Sheryl Marsh](#)
To: [Sardel, Scott](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:53:15 PM

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Dear Scott Sardel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Sheryl Marsh
5030 Alhambra Way, Oceanide, CA 92056-5159

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Comment Letter I298: Karen Martien, April 19, 2023

I298

From: karen@severysouthcoast.com on behalf of Karen Martien
To: [BIA Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 8:43:07 PM

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Dear CEQA Planning Department,

- I298-1 | As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.
 - I298-2 | The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural resilient infrastructure. This is a critical component of the 1994 Mission Bay Park Master Plan that can best be guaranteed by the kind of green infrastructure restored wetlands will provide.
 - I298-3 | The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.
 - I298-4 | The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.
 - I298-5 | The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.
 - I298-6 | The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.
 - I298-7 | Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.
- Sincerely,
 Karen Martien
 4328 Rotas St San Diego, CA 92122-2631

I298-1: This comment requests that the City of San Diego (City) prioritize the need for maximum wetland restoration. This comment will be provided to decision makers for their consideration. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is required.

I298-2: This comment states that the PEIR should include a project objective that prioritizes improving water quality through natural resilient infrastructure. The project objectives listed in PEIR Chapter 3.0, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Section 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

I298-3: This comment states that the PEIR is missing details on the foreseeable impacts from sea level rise. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable

wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

- I298-4:** The comment states that the PEIR fails to consider the ReWild Mission Bay “Wildest” proposal in relation to the City’s Climate Action Plan (CAP) restoration goal of 700 acres of restored tidal marsh by 2035.

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. Chapter 8.0 evaluates four alternatives that were selected for additional analysis; in addition, Chapter 8.0 also identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the Re Wild Mission Bay “Wildest” proposal, is provided in Chapter 8.0.

Other restoration areas within the City’s jurisdiction are being considered to meet the goals of the City’s Climate Action Plan (CAP). The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 227 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City’s

CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

I298-5: This comment states that the endangered Ridgway's rail and other threatened and endangered native species will lose their habitat as sea levels rise and will be lost if the rewilding process is not started now. A project-specific Sea Level Rise Study has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The project would expand habitat areas, resulting in long-term benefits to wetland habitat; species, including the endangered Ridgway's rail; and the functions and values of the aquatic resources. No further revisions to the PEIR are warranted.

I298-6: This comment states that the PEIR fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem, and that all San Diegans will benefit from access to a vibrant tidal marsh. The City concurs that access to a restored tidal ecosystem would be a benefit to all San Diegans, including members of local Tribal nations. However, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." No revisions to the PEIR are warranted.

I298-7: This comment concludes the comment letter by offering a thank you for consideration. This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is warranted.

Comment Letter I299: Margaret Martinovic, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: margemartin2@everactioncustom.com on behalf of margaret.martinovic
To: [PLAN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 8:14:20 PM

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Dear CBQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
margaret.martinovic
3826 Avenida Johanna, La Mesa, CA 91941-7312

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Comment Letter I300: Richard Martyn, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: rmartyn12@severnactionssystem.com on behalf of [Richard Martyn](#)
To: [PLN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 3:20:04 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Richard Martyn
1474 Ponderosa Ave Fullerton, CA 92835-2037

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Comment Letter I301: Kathleen Marvel, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: kathleenmarvel@beyersactionconsult.com on behalf of Kathleen Marvel
To: [B.N. Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 3:44:30 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildcat plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildcat proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds - original members of the 1973 Endangered Species Act - will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeayay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Kathleen Marvel
1980 Silverleaf Cir Unit 321, Crystal, CA 92009-8427

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Comment Letter I302: Marcie Mason, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: mason_marcie@severactioncustom.com on behalf of [Marcie Mason](#)
To: [PN PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:50:29 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Marcie Mason
3086 E Fox Run Way San Diego, CA 92111-7718

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Comment Letter I303: Mary Mason, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: mickel2me2net@verizon.com on behalf of [Mary M. Mason](#)
To: [PUN_Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 6:27:10 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise: How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeiyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Mary M. Mason
5732 Grimsby Dr Huntington Beach, CA 92649-4842

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Comment Letter I304: Gretchen Mavrovouniotis, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: Gmavrovouniotis@ceqa.com on behalf of Gretchen Mavrovouniotis
To: [Bill Flannery@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:39:22 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear CBOA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rail. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Gretchen Mavrovouniotis
14 Sumner Irvine, CA 92614-5402

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Comment Letter I305: Michael Mavrovouniotis, April 19, 2023

I305

From: mimavro@severactioncustom.com on behalf of Michael Mavrovouniotis
To: [PLN Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:18:15 PM

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Dear CEQA Planning Department,

- I305-1 | As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.
 - I305-2 | The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.
 - I305-3 | The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.
 - I305-4 | The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.
 - I305-5 | The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.
 - I305-6 | My wife and I are frequent visitors to many of San Diego's attractions - including the museums in Balboa Park, the Zoo, and the USS Midway and the other harbor attractions. But what we love the most in San Diego is its natural spaces, because we are avid birdwatchers. Please restore crucial wetlands and protect the Ridgway's Rail!
 - I305-7 | Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.
- Sincerely,
Michael Mavrovouniotis
14 Stariver Irvine, CA 92614-5402

I305-1: This comment requests that the City of San Diego (City) prioritize the need for maximum wetland restoration. This comment will be provided to decision makers for their consideration. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is warranted.

I305-2: This comment states that the PEIR should include a project objective that prioritizes improving water quality through natural resilient infrastructure. The project objectives listed in PEIR Chapter 3.0, Project Description, include Objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Section 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as is called for in the Mission Bay Park Master Plan, and no revision to the project objectives is warranted.

I305-3: This comment states that the PEIR is missing details on the foreseeable impacts from sea level rise. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and

conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

I305-4: The comment states that the PEIR fails to consider the ReWild Mission Bay “Wildest” proposal in relation to the City’s Climate Action Plan (CAP) restoration goal of 700 acres of restored tidal marsh by 2035.

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. Chapter 8.0 evaluates four alternatives that were selected for additional analysis; in addition, Chapter 8.0 also identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the Re-Wild Mission Bay “Wildest” proposal, is provided in Chapter 8.0.

Other restoration areas within the City’s jurisdiction are being considered to meet the goals of the City’s Climate Action Plan (CAP). The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt

marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 225.1 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City's CAP. As identified in the City's CAP, one of the identified actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreages. No revisions to the PEIR are warranted.

I305-5: This comment states that the endangered Ridgway's rail and other threatened and endangered native species will be lost if the rewilding process is not started now. The project would expand habitat areas, resulting in long-term benefits to wetland habitat; species, including the endangered Ridgway's rail; and the functions and values of the aquatic resources. See response to comment I305-3 regarding the Sea Level Rise Assessment Technical Report prepared for the Final PEIR.

I305-6: This comment states that the PEIR fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem, and that all San Diegans will benefit from access to a vibrant tidal marsh. The City concurs that access to a restored tidal ecosystem would be a benefit to all San Diegans, including members of local Tribal nations. However, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the

significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.” This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR, and no further response is warranted.

I305-7: This comment asks to restore the Ridgeway’s rail and concludes the comment letter by offering a thank you for consideration. The project would expand habitat areas, resulting in long-term benefits to wetland habitat; species, including the endangered Ridgeway’s rail; and the functions and values of the aquatic resources. This is also a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is warranted.

Comment Letter I306: Barney McComas, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: barndoggy@reverselocationstems.com on behalf of Barney McComas
To: [D.H. Fleming@CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:07:00 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2055, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds - original members of the 1973 Endangered Species Act - will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kamehameha and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Barney McComas
3770 Georgia St Apt 8 San Diego, CA 92103-7600

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Comment Letter I307: Sparrow McMorran, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: sparrow_7@my.spectrum.com on behalf of Sparrow McMorran
To: PJA_Flaming@CEQA
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:19:13 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Sparrow McMorran
225 Leucadia Blvd Encinitas, CA 92024-1717

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Comment Letter I308: Shannon McNeil, April 19, 2023

I308

From: smcneill@everaction.com on behalf of Shannon McNeil
To: [P.U. Planning/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 5:52:06 PM

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Dear CEQA Planning Department,

I308-1 As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

I308-2 The city's final EIR must prioritize water quality by adding a specific objective to improve water quality in the study area and bay through natural, resilient infrastructure. Water quality is a crucial component of the 1994 Mission Bay Park Master Plan, best guaranteed by restored wetlands.

I308-3 The draft EIR for the De Anza plan is also missing details on foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, the ReWild Mission Bay Wildrest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildrest proposal against the city's own Climate Action Plan goals.

I308-4 The ecological implications are critical and time is being wasted. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

I308-5 The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

I308-6 Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Shannon McNeil
PO Box 2644 Borrego Springs, CA 92004-2644

I308-1: This comment requests that the City of San Diego (City) prioritize the need for maximum wetland restoration. This comment will be provided to decision makers for their consideration. This comment does not address the adequacy or accuracy of the Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), and no further response is warranted.

I308-2: This comment states that the PEIR should include a project objective that prioritizes improving water quality through natural resilient infrastructure. The project objectives listed in PEIR Chapter 3.0, Project Description, include project objective 4 to embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove. Please see PEIR Section 5.7, Hydrology and Water Quality, for a discussion of how the proposed project's design features and restoration of natural habitat will enhance water quality. The project does prioritize improving water quality, as called for in the Mission Bay Park Master Plan, and no revisions to the project objectives are warranted.

I308-3: This comment states that the PEIR is missing details on the foreseeable impacts from sea level rise. A project-specific Sea Level Rise Assessment Technical Report has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The Sea Level Rise Assessment Technical Report includes a sea level rise modeling assessment and conceptual grading exercise that demonstrates how 85.6 acres of viable wetland habitat for the proposed project and 87.3 acres of viable

wetland habitat for the Wetlands Optimized Alternative can persist under a 7-foot sea level rise scenario.

- I308-4:** The comment states that the PEIR fails to consider the ReWild Mission Bay “Wildest” proposal in relation to the City’s Climate Action Plan (CAP) restoration goal of 700 acres of restored tidal marsh by 2035.

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, an EIR need not consider every conceivable alternative to a project, but it must consider a reasonable range of potentially feasible alternatives. The PEIR includes a reasonable range of alternatives in PEIR Chapter 8.0, Alternatives. Chapter 8.0 evaluates four alternatives that were selected for additional analysis; in addition, Chapter 8.0 also identifies the ReWild Mission Bay “Wild,” “Wilder,” and “Wildest” alternatives; Campland-Provided Plan Alternative; and Mission Bay Gateway Plan Alternative, which were considered in the PEIR but rejected for their failure to meet the project objectives. The rationale for elimination of each of these alternatives, including the Re Wild Mission Bay “Wildest” proposal, is provided in Chapter 8.0.

Other restoration areas within the City’s jurisdiction are being considered to meet the goals of the City’s Climate Action Plan (CAP). The goal of CAP Measure 5.1, Sequestration, is to meet a 2030 target of restoring 350 acres and a 2035 target of restoring 700 acres of salt marsh land and other associated tidal wetland and riparian habitat. The project proposes to enhance 227 acres of wetlands in the Mission Bay Park. The project was not intended to restore all salt marsh land and other associated tidal wetland and riparian habitats identified in the City’s CAP. As identified in the City’s CAP, one of the identified

actions to meet the 750-acre goal was to develop an area-specific management plan to protect, restore, and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. The project would assist the City in reaching its 2030 and 2035 target restoration acreage. No revisions to the PEIR are warranted.

I308-5: This comment states that the endangered light-footed Ridgway's rail and other threatened and endangered native species will be lost if the rewilding process is not started now. A project-specific Sea Level Rise Study has been prepared and is included in the Final PEIR as Appendix N to inform the future design of the project. The project would expand habitat areas, resulting in long-term benefits to wetland habitat; species, including the endangered Ridgway's rail; and the functions and values of the aquatic resources. No further revisions to the PEIR are warranted.

I308-6: This comment states that the PEIR fails to analyze the recreational and cultural opportunities of connecting the Mission Bay Park to a restored tidal ecosystem and that all San Diegans will benefit from access to a vibrant tidal marsh. The City concurs that access to a restored tidal ecosystem would be a benefit to all San Diegans, including members of local Tribal nations. However, as stated in CEQA Statute Section 21002.1, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." No revisions to the PEIR are warranted.

I308-7: This comment concludes the comment letter by offering a thank you for consideration. This is a closing comment and

does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the PEIR. Therefore, no further response is warranted.

Comment Letter I309: Mike Merlesena, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: mrm12728@everyactioncustom.com on behalf of [Mike Merlesena](#)
To: [Sandel, Scott](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 2:38:52 PM

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Dear Scott Sandel,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildest plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildest proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeyaay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Mike Merlesena
3779 Florida St Apt 3 San Diego, CA 92104-3216

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Comment Letter I310: Vanessa Metzler, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: vanessametzler@seweractioncustom.com on behalf of Vanessa Metzler
To: [B.J. Flannery/CEQA](#)
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 12:05:14 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by adding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildset plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildset proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rail. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeeyaa and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Vanessa Metzler
6777 Lomiera St. Carlsbad, CA 92011-3434

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Comment Letter I311: Michael Michel, April 19, 2023

This comment letter is a duplicate of comment letter I88. Please refer to comment letter I88 for responses to this comment letter.

From: michel@mvhac007@recreationaction.com on behalf of Michael D. Michel
To: EIR Planning/CEQA
Subject: [EXTERNAL] De Anza Natural Wetland Restoration Plan
Date: Wednesday, April 19, 2023 1:46:27 PM

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Dear CEQA Planning Department,

As you consider how to build and improve upon the De Anza Natural wetland restoration plan for the northeast corner of Mission Bay, I'd like to ask you to prioritize the need for maximum wetland restoration in order to truly make the city's wetland restoration effort successful.

The city's final Environmental Impact Report (EIR) for this project must prioritize water quality by aiding a specific project objective to improve the water quality of the study area and the bay through natural, resilient infrastructure. As you're aware, water quality is a crucial component of the 1994 Mission Bay Park Master Plan, and water quality can best be guaranteed by the kind of green infrastructure restored wetlands will provide.

The city's draft EIR for the De Anza plan is also missing details on the foreseeable impacts from sea level rise. How can the city determine the best land-use plan without knowing how climate change will affect our park? While the city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035, only the ReWild Mission Bay Wildcat plan provides the most direct way to achieve this goal with maximum wetland restoration. Unfortunately, the draft EIR for the De Anza Natural plan fails to consider the ReWild Mission Bay Wildcat proposal against the city's own Climate Action Plan goals.

The ecological implications are critical and time is wasting. Kendall-Frost Marsh Preserve in Mission Bay provides the best habitat for endangered Ridgway's Rails. Yet these birds – original members of the 1973 Endangered Species Act – will lose their habitat over the next several decades as sea levels rise and their habitat is inundated. Unless we begin the ReWilding process now, these and other threatened and endangered native species will be lost, when they could've readily been saved.

The city's proposal also fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. This will ensure that everyone, especially the Kumeayay and those in underserved communities, will benefit from access to a vibrant tidal marsh with expanded recreation opportunities.

Thank you for your kind consideration of our recommendations on how to improve the De Anza Natural plan.

Sincerely,
Michael D. Michel
28224 Mariners Way, Menifee, CA 92584-8008

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