

**MINUTES OF THE REGULAR MEETING OF THE  
MISSION VALLEY PLANNING GROUP**

**February 6, 2013**

MEMBERS PRESENT

Marla Bell  
Paul Brown  
John Carson  
Gina Cord  
Monica Davis  
Perry Dealy  
Robert Doherty  
Randall Dolph  
Alan Grant  
Elizabeth Levanthal  
John Nugent  
Alex Plishner  
Brittany Ruggels  
Karen Ruggels  
Dottie Surdi

MEMBERS ABSENT

Deborah Bossmeyer  
Michael McDowell  
Jason Broad  
Marco Sessa

CITY STAFF

Oscar Galvez III  
Robin Shifflet  
Jack Straw  
Lisa Wood

GUESTS

Marco Cabrera  
Diana Uriostegui  
Kathryn Sykes  
Rob Hutsel  
Josh Weiselberg  
Sarah Czarrecki  
Jonathan Hardy  
John LaRaia  
Christine Conticano  
Rick Wilson  
Lisa Gualco  
Bruce Warren  
Kurt Tellefsen  
Dave Schwab

ASSEMBLY STAFF

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President Dottie Surdi called the regular meeting of the Mission Valley Planning Group (MVPG) to order at 12:01 p.m. at the Mission Valley Library located at 2123 Fenton Parkway.

**A. CALL TO ORDER**

Verify Quorum – 15 members were present, constituting a quorum.

**B. PLEDGE OF ALLEGIANCE** – Monica Davis led the Pledge of Allegiance.

**C. INTRODUCTIONS / OPENING REMARKS**

Guests introduced themselves.

**D. APPROVAL OF MINUTES**

Gina Cord moved to approve the minutes of the January 9, 2013 regular meeting. seconded the motion. Paul Brown seconded the motion. 14 – 0 – 1, with Monica Davis abstaining.

**E. PUBLIC INPUT – NON-AGENDA ITEMS**

Brittany Ruggels noted that, while the MVPG is the voice of the community, all guests are invited to participate actively in discussions and are strongly encouraged to do so.

F. **MEMBERSHIP BUSINESS** – Brittany Ruggels

Brittany Ruggels noted that four vacancies exist, two in the property owner and two in the property taxpayer classifications. She explained the qualifications that interested parties must meet and invited all members of the audience to contact her if they are interested in serving.

G. **TREASURER’S REPORT** – Bob Doherty reported a balance of \$589.43. He noted that a letter will be sent out shortly soliciting contributions from the community to help defray operating expenses.

H. **PUBLIC SAFETY REPORTS**

1. Police Department – Officer Holly introduced herself as the new community liaison and invited MVPG members and guests to contact her with any concerns. She summarized recent criminal activity in the area and encouraged everyone to report suspicious behavior. She also noted that the future of red light cameras at intersections is in limbo.

2. Fire Department – No report.

I. **NEW BUSINESS**

**1. Mission Valley Interim Public Facilities Financing Plan – (Action Item)**

Karen Ruggels provided background information on the status of this effort, noting that the MVPG subcommittee met several times to review documents and formulate recommendations. She distributed a handout listing the subcommittee’s recommendation of seven priorities, listed from highest to lowest.

Oscar Galvez, representing the City of San Diego, reported that the Interim PFFP is slated to go before the City’s infrastructure committee and then on to the City Council for final approval.

Karen Ruggels addressed the seven recommended priorities and invited the full MVPG to provide input. Members voiced a concern that the Mission Valley Fire Station 45 had been eliminated from the priority list, although it remains included in the financing plan. Other concerns were raised regarding pedestrian improvements being included in the roadway and bridge projects, and the fact that the SR 163 and Friars Road on-off ramp improvements are slated for completion in 2016, not 2014 as stated in the plan’s documents.

Randy Dolph moved that the priority list formulated by the subcommittee be approved for submittal to the City with an amendment to add the Mission Valley Fire Station 45 as the first priority, with the others to remain SR 163 and Friars Road on-off Ramp Improvements; Hazard Center extension; Mission City Parkway Bridge; Widening Camino del Rio North; I-8 West/Qualcomm Way Off-Ramp; Mission Center Road Bridge over I-8; and Pedestrian Path/Bikeways along

both sides of the San Diego River. Karen Ruggels seconded the motion. 15 – 0 – 0.

## **2. City of San Diego Solid Waste Code Enforcement – (Information Item)**

Bob Doherty led a discussion regarding municipal code compliance on private property along the river. He noted that transient activity along the river is a serious issue, and that the debris that results is required to be removed by the property owner. Bob also noted that the City will notify individual property owners if they are in violation of the code requiring clean-up and encouraged everyone to report problem areas to the City.

Lisa Wood, representing the City's Environmental Services Department, explained that budgetary constraints exist and that priorities for clean-up often are based upon input from the community. She can be reached at 858-573-1236; she will refer the caller to the appropriate code enforcement personnel. She described the enforcement protocol for requiring clean-up.

Brittany Ruggels noted that the March 2013 MVPG agenda will include an item addressing the formation of a homelessness subcommittee which, if formed, may address the debris issue.

Jonathan Hardy, representing Congresswoman Susan Davis' office, noted that a pertinent bill, AB 5, is circulating now. AB 5 would enact the Homeless Person's Bill of Rights and Fairness Act, which would provide that no person's rights, privileges, or access to public services may be denied or abridged because he or she is homeless, has a low income, or suffers from a mental illness or physical disability. Mr. Hardy offered to send AB 5 to Dottie Surdi for distribution to the MVPG members.

Rob Hutsel reported that homeless camps and trash along the river are visible on a map at a San Diego River Park Foundation website: [www.imrivers.com/sandiego09](http://www.imrivers.com/sandiego09). Karen Ruggels noted that trash collection is addressed in the San Diego River Park Master Plan

## **J. OLD BUSINESS**

### **1. San Diego River Park Master Plan (Continued Item) – (Action Item)**

Karen Ruggels provided a recap of the status of this item, noting that the MVPG subcommittee members had met since the January 9, 2013 discussion of this matter and had worked with City staff to address concerns expressed at that meeting. The subcommittee had redrafted a letter setting forth the MVPG's position on the master plan, which was circulated to all members prior to the meeting, with copies available for guests at the meeting. Karen reminded those in attendance that this item had been continued specifically to offer an opportunity for all interested parties to provide input.

After summarizing the points in the new draft letter, and noting key differences between it and the draft presented at last month's meeting, Karen invited comments. Rob Hutsel, representing the San Diego River Park Foundation,

offered several comments and suggestions regarding the need to clarify or modify some language in the letter.

Karen also discussed an attachment to the letter which addresses proposed changes to language regarding key sites of the Lower Valley Reach, namely Riverwalk Golf Course and Qualcomm Stadium.

Following a lengthy discussion of Rob's proposed language changes, as well as revisions to the proposed attachment, members revised both documents to incorporate the input offered during discussion.

Brittany Ruggels moved to send the letter and attachment as revised, under MVPG President Dottie Surdi's signature, in support of the San Diego River Park Master Plan with recommendations for revisions to the master plan. Perry Dealy seconded the motion. 14-0-0. Both the letter and attachment as adopted are attached to these minutes.

**2. City Planning Update** – Brian Schoenfisch not being present, Robin Shifflet reported that the update to the Mission Valley Community Plan is included in this year's budget, which is slated for adoption by the City Council in July.

**3. City Council Office** – Jack Straw was not present. No report.

#### **4. Subcommittee Reports**

a. Design Advisory Board – Randall Dolph – Randy reported that the DAB did not meet. He clarified that the new meeting day is the Monday immediately prior to the MVPG regular meeting and requested that future agendas be revised to state this.

b. Stadium Committee – Randall Dolph – Randy presented information from an article that appeared in the February 3, 2013 edition of the Union-Tribune, concerning pollution clean-up efforts beneath the stadium site Paul Brown noted that plume clean-up will be completed by the end of 2013. Perry Dealy suggested that the MVPG monitor Mayor Bob Filner's proposal to accommodate the Chargers.

c. San Diego River Coalition – Alan Grant – Alan reported that recent matters under discussion included the City of Villages concept and the Rim-to-Rim Trail.

d. Community Planners Committee – Dottie Surdi – Dottie reported that major topics of discussion included Community Plan updates and the implementation of a test area to curtail parking trailers, including boat trailers, in residential areas.

e. Parks Subcommittee – Jason Broad not being present, there was no report.

f. Uptown Regional Bike Corridor Advisory Group – Brittany Ruggels – Brittany reported that the group's second meeting would be held on the evening of February 6, 2013. Routes connecting neighborhoods will be a focus of the group.



g. Mission Valley PFFP Interim Update Subcommittee – Karen Ruggels – This matter having been finalized, the subcommittee is dissolved.

#### **5. Miscellaneous Mail**

There was no miscellaneous mail.

#### **K. GOVERNMENTAL STAFF REPORTS**

1. Mayor's Office – Denise Garcia was not present. No report.
2. Senate Member's Office – Deanna Spehn was not present. No report.
3. Assembly Member's Office – Jason Weisz was not present. No report.
4. Congresswoman Susan Davis' Office -- Jonathan Hardy distributed copies of a newsletter from his office.
5. Congressman Scott Peters' Office – Sarah Czarrecki introduced herself and invited everyone to attend an open house on February 16, 2013 at the congressman's new San Diego office.

L. **ADJOURNMENT** – There being no further business to be brought before the Committee, the meeting was adjourned at 2:03 p.m. The next meeting will be on Wednesday, March 6, 2013 at 12:00 p.m. at the Mission Valley Library, Community Room.

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Brittany Ruggels, Secretary

## **MISSION VALLEY PLANNING GROUP**

9215 Piantino Way, San Diego, CA 92108  
(858) 349-2007

February 8, 2013

Ms. Robin Shiflet, Project Manager  
City of San Diego Development Services Department – Planning Division  
1222 First Avenue, MS 413  
San Diego, CA 92101

### **SUBJECT: SAN DIEGO RIVER PARK DRAFT MASTER PLAN**

Dear Ms. Shiflet:

The Board members of the Mission Valley Planning Group recognize and acknowledge the amount of time, effort, and money the City, San Diego River Park Foundation, and others have put into creating a draft Master Plan for the San Diego River Park. Furthermore, we appreciate that the City has encouraged the Mission Valley Planning Group to be a part of that process.

Mission Valley is perhaps the one community in San Diego that is most influenced by the presence of the San Diego River, which runs through the middle of our community and provides both wildlife habitat and public enjoyment. As such, the Planning Group wants to be sure that implementation of the SDRPMP is a success. In order to do this, the Master Plan must be clearly focused on celebrating and engaging the river – for both its habitat and wildlife values **and** as an integral feature of the built environment that occurs on both the north and south sides of the river. The SDRPMP will set a strong foundation for the update of our Community Plan, and our intent is to provide for the long-term health and viability of the river in a manner that does not unduly constrain full and complete evaluation of land uses as part of the Community Plan update process.

The Mission Valley Planning Group submitted two letters of comment on the San Diego River Park Draft Master Plan (SDRPMP): one dated February 2, 2011, which addressed the then current version of the draft SDRPMP; and one dated March 7, 2011, which addressed the proposed amendments to the Mission Valley Community Plan and the Mission Valley Planned District Ordinance. Our previous correspondence provided a detailed list of comments, and we appreciate the efforts that staff has taken to address and respond to those comments.

Most recently, staff has worked with our San Diego River Park Draft Master Plan Subcommittee to modify and/or add language to the Draft Master Plan in direct response to many of our comments and concerns such that most of our comments have been addressed through revisions to the Draft Master Plan. There remain, however, overarching concerns, as well as one design element, which have not been adequately addressed. The purpose of this letter is to focus on the remaining areas of concern that we do not feel have been adequately addressed or considered in the Master Plan.

### **LACK OF A FULLY DEVELOPED, COMPREHENSIVE PLAN**

First and foremost, and as stated in our previous letter, we continue to be concerned that approval of the SDRPMP is premature. The SDRPMP would function as an amendment to our Community Plan. However, our Community Plan is woefully outdated. As such, we are at a disadvantage in that we are not able to consider the whole of planning for our community in our evaluation of the SDRPMP; in other words, we are unable to evaluate other land use changes, which could either enhance or conflict with the SDRPMP.

Amending the Community Plan for the SDRPMP without consideration of other revisions to land uses in Mission Valley is conducting planning in a vacuum; such an approach lacks the advantage of comprehensive knowledge of planning and land use goals that are important to our community and which would be considered through a comprehensive Community Plan update process. This is unfortunate, as the Master Plan eventually adopted for the San Diego River Park may preclude other planning and land use goals that the Planning Group might want to evaluate as part of the update of our Community Plan. For example, the SDRPMP makes recommendations relative to land uses for a future amendment to the approved Riverwalk Specific Plan, as well as how a future park at Qualcomm Stadium should be designed – land use and park planning decisions that should be considered in concert with a comprehensive update of our community plan.

However, we recognize the importance and value of the SDRPMP, we understand that it needs to be moved forward now for a decision by City Council. Furthermore, we understand that the SDRPMP may be amended as necessary and in harmony with a future update of our Community Plan. Therefore, we request that the SDRPMP include specific language that states:

***Future updates of Community Plans along the San Diego River may request amendments to the SDRPMP to ensure consistency.***

Additional recommended SDRPMP text revisions relative to this comment are included as an *Attachment* to this letter.

### **PURPOSE FOR THE SAN DIEGO RIVER MASTER PLAN**

City staff has indicated that the SDRPMP is a *policy* document, offering recommendations rather than requiring strict adherence to guidelines presented in the SDRPMP. However, that is not explicit in the Master Plan. Instead, the Master Plan explicitly states: *The San Diego River Park Master Plan is a policy document upon which all land use decisions along the river will be based.* (Emphasis added.)

The Mission Valley Planning Group requests that this text and any similar text appearing elsewhere in the Master Plan be revised to read:



***The San Diego River Park Master Plan is a policy document and provides recommendations and guidelines to be considered in concert with land use decisions within the River Corridor, River Path, and River Influenced areas along the San Diego River as defined in this plan.***

### **UNDERESTIMATING THE ACTUAL IMPACT ON DEVELOPMENT AND REDEVELOPMENT OPPORTUNITIES**

When private development projects are proposed to the City that are located proximate to or include wetlands and riparian area, the City Environmentally Sensitive Lands Ordinance (LDC §143.0141) requires that the applicant confer with resource agencies (U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers, and California Department of Fish and Game). In our previous letters of comment, we requested that the SDRPMP be reviewed by the resource agencies to be sure that the Master Plan can be implemented in light of federal and state regulations and also to be sure that the Master Plan includes any other anticipated restrictions and constraints (such as permitted uses in the river and within the River Corridor) that would be required when public and private projects along the river are brought forward for consideration. Since that review has not occurred, we cannot review the SDRPMP with any confidence that recommendations included in the SDRPMP are even possible or whether the Master Plan's recommendations would require restrictions and requirements that go beyond what is included in the SDRPMP, making its implementation ultimately impossible.

The Master Plan clearly defines the River Corridor as the floodway (as mapped by the Federal Emergency Management Agency, FEMA), plus 35 feet on both sides of the river to accommodate the Pathway Corridor, and the River Influence Area as an area 200 feet in width beyond the River Corridor Area. Generally, an area 235 feet in width on both sides of the San Diego River would be regulated by the Master Plan. In reality, however, this area can be 335 feet or greater in width, if the Multi-Habitat Planning Area (MHPA) and the desired 100-foot wide wetland buffer is considered.<sup>1</sup> When this worst-case dimension is overlaid on the Land Use Plan for Mission Valley, planned land uses along the river can be drastically affected. Furthermore, in some areas of Mission Valley, the area between frontage roads, such as Camino de la Reina and Camino del Rio North, and the river is quite narrow. Subjecting these areas to the restrictions of the Master Plan will make development and redevelopment less likely to occur. Public facilities are predicated on the land uses assumed in the community plans. Additionally, the assumed land uses assure build-out of a functional community. Implementation of the SDRPMP may likely preclude or inhibit future development and redevelopment that is vital not only to the functionality of our community, but also allows the

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<sup>1</sup> As defined in the City's Biology Guidelines:

*Wetland buffers should be provided at a minimum 100 feet wide adjacent to all identified wetlands. The width of the buffer may be either increased or decreased as determined on a case-by-case basis, in consultation with the California Department of Fish and Game, the U.S. Fish and Wildlife Service and the Army Corps of Engineers, taking into consideration the type and size of development, the sensitivity of the wetland resources to detrimental edge effects, natural feature such as topography, the functions and values of the wetland and the need for upland transitional habitat.*



Mission Valley community to continue to grow and evolve over time.

We recognize that actual mapping for wetland and riparian habitat and defining the biology buffer is project-specific and determined through discussions with City staff and the resource agencies, and that the City's Multi Habitat Planning Area (MHPA) is set. Therefore, for the portion of the SDRPMP that occurs within the Mission Valley community, we request that the following recommendation be included in the Master Plan:

***In the Mission Valley Community Plan area, any modifications and re-development of properties along the San Diego River that have developed in accordance with the Mission Valley Community Plan shall not require a wetland greater than what is established in the First San Diego River Improvement Project (FSDRIP) for areas located within the FSDRIP Specific Plan or wider than the 35 foot wide pathway corridor for other fully developed properties along the San Diego River.***

#### **HOMELESS POPULATION, CRIMINAL ACTIVITY, AND SECURITY**

The SDRPMP does not acknowledge the homeless activity so prevalent in Mission Valley and does not provide adequate guidelines to ensure that a River Park, once developed, can be safely enjoyed by all. The Mission Valley Planning Group views the homeless activity in our community as a real impediment to successful implementation of the Master Plan. While we understand that the Master Plan cannot directly address the homeless population, we would like to see the Master Plan provide a greater emphasis on design guidelines which minimize "criminal activity" and promote safety. Instead of the minor discussion of security within Section 5.3.1, *Maintenance, Management, and Security Tools*, we recommend that *Security* be broken out as a separate section in the Master Plan and that specific guidelines, with the goal of eliminating all forms of criminal activity within the River Park, be developed.

The Master Plan should recognize and take credit for developing a trail system that will provide good public access, receive great use, and energize the River Corridor. This increased activity can go a long way toward deterring homeless encampments and associated activities. Specific guidelines, including considering a more regular policing of the River Park, should be developed by staff more familiar with ways to deter all types of criminal activity in a park setting. While Section 5.3 is broken into "Tools" and "Programs," the details for each of the three elements are aggregated. Because of the limited mention of and focus on security issues, safety and security are lost in a laundry list of other maintenance and management tools and programs. We request that a section focusing on Security be added to the Master Plan; one which reflects our concerns that the homeless population along the San Diego River creates a negative image and potential safety issue that can discourage – rather than encourage – public use of and access to the River Park.

If a separate section devoted to Safety and Security cannot be included in the SDRPMP, we request that this section be broken into subsections using the section categories – Maintenance, Management, Security – and that a separate discussion of the tools and programs for each be provided. This will force a more specific, detailed focus on security of the river. Below is a

suggested format for the revised section.

### **5.3.1 Maintenance**

5.3.1.1 Maintenance Tools

5.3.1.2 Maintenance Programs

### **5.3.2 Management**

5.3.2.1 Management Tools

5.3.2.2 Management Programs

### **5.3.3 Security**

5.3.3.1 Security Tools

5.3.3.2 Security Programs

Additionally, we request the following revisions be made to Section 5.0 to more directly address safety and security in the River Park:

Page 145 – 5.0 *IMPLEMENTATION* – Add the following sentence to the middle of the paragraph:

*Of equal importance are maintenance, management, and security for the river park. Focusing on these elements will ensure a pleasant, desirable, and safe experience for those who make use of the River Park’s passive and active recreation opportunities. These programs can . . .*

Page 158 – 5.3 *Maintenance, Management, and Security* – While Security is included in the title of this subsection, the introductory paragraph makes no mention of anything dealing with security and/or safety. The following should be added to this introductory paragraph:

***The San Diego River Park shall not be used for unauthorized encampments.***

Also, add the following sentence to the middle of this paragraph:

*Maintenance activities include . . . Security measures should ensure there are no impediments to enjoying the River Park such as those that create personal safety concerns and/or violate local and state laws/regulations. Currently, all land owned by the City . . .*



## **GRANTING OF POPULATION-BASED PARK CREDITS FOR IMPLEMENTATION OF THE MASTER PLAN**

As the SDRPMP expresses, this is a Master Plan for the San Diego River Park. (Emphasis added.) Therefore, it is a park and should be credited as satisfying some of the park needs for Mission Valley. However, this is not clearly stated in the Master Plan. The Master Plan should include the following statement:

***For the Mission Valley Community Plan, the San Diego River Park can be counted toward population-based park needs in the community, with up to 25 percent of the River Park land area counted as population-based park land.***

The SDRPMP should allow a property owner who constructs a greater area of the River Pathway or includes a greater amount of public amenities within the Master Plan area to receive population-based park credit. City staff has worked to make revisions to the Master Plan allowing the granting of park credits. However, the Master Plan requires that these privately-funded River Path/Park improvements be reviewed in accordance with *Council Policy for Community Notification and Input for Citywide Park Development Projects*, adding yet another level of review and costs for a private developer. While we understand the need for a public park to undergo a comprehensive review in accordance with the City Council Policy, there should also be guidelines for trail projects and small park amenity projects that are consistent with the guidelines in the Master Plan to be processed as an element of a private development without requiring this additional – redundant – review effort. Therefore, we recommend the following changes to the revised text that staff has added to the Master Plan:

***Where development within the River Corridor or River Influence Areas constructs a portion of the River Pathway, expands the River Pathway, or adds other River Park Elements, population-based park credits shall be granted **equivalent-commensurate** to these areas if the **those park amenities-elements** are consistent with the **guidelines contained in this Master Plan and the Recreation Element of the City's General Plan.** ~~and~~ **Council Policy for Community Notification and Input for Citywide Park Development Projects shall not apply to privately constructed portions of the River Path or privately developed park areas that are less than XXXX square feet in size and are in compliance with the guidelines in this Master Plan.*****

Additionally, the Master Plan should include a provision that in lieu park fees can be specifically applied to construction of the River Path. Therefore, we recommend the following be added to the Master Plan:

***Where in lieu park fees are collected as a result of private development, those fees may be applied toward construction of the San Diego River Park Master Plan River Pathway.***

**DESIGN GUIDELINES: FENCES**

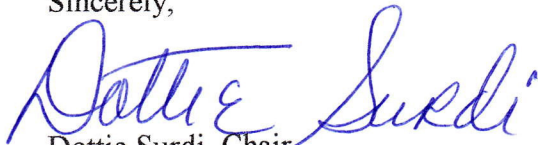
In previous letters and in discussions with City staff, we have requested modifications to specific Design Guidelines that we felt were too restrictive; and we appreciate staff's efforts to work with us to modify certain Design Guidelines. Currently, the Master Plan recommends "Use natural peeler log fencing for all fences within the River Corridor Area to allow for wildlife movement." We request that this design guideline be modified to recognize that, depending on the location along the River, such materials could be in direct conflict with architecture within the adjacent urban development. Please revise the Master Plan as follows:

*Use natural peeler log fencing for all fences within the River Corridor Area where adjacent areas are natural open space and/or parks to allow for wildlife movement. Fencing within the River Corridor Area where urban developments abut the River Corridor, should be of low-impact, allow for wildlife movement, and be designed in a manner to blend with the natural attribute of the river environment while also complimentary to adjacent urban structures. Fencing should follow grades along the river pathway and be a maximum of 4 feet in height.*

*Please note that our recommendations for changes to the SDRPMP will also need to be followed through in the proposed amendments to the Planned District Ordinance and Mission Valley Community Plan.*

Once again, the Mission Valley Planning Group wishes to thank you for providing the opportunity to be a part of the planning process for the San Diego River. The Mission Valley Planning Group supports the San Diego River Park Draft Master Plan, with the recommendations as specified in this letter.

Sincerely,



Dottie Surdi, Chair  
Mission Valley Planning Group

cc: Councilman Scott Sherman  
Cecilia Gallardo, Deputy Director  
Brian Schoenfisch, City of San Diego  
Board Members, Mission Valley Planning Group



# ATTACHMENT

## Key Sites of the Lower Valley Reach

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- I MiiyIrxMxatioyIaydIMildrxy'xIblaylarxall
- noMatioylyxuallylorIMyMbtuallyIMoyxMxdltoltuxlriyxrll
- I uaraMxrlxflxMiygtuxlriyxr'lxMologylaydluixtoryIII

**B. Qbal: ommPtadvmPt. BI**

I uxIMixxioyIVallxyII ommuyityIVlaylloMtxxlall ommuyityIVarklatItuxlQualMmmlztadiumixitx.IIDxyxlobmxytloflalubliM barklaxIbartloflfuturxI-yyIbotxytiaI rdxxylobmxytloftuxlQualMmmlxixMxatxltuxlobbortuyityIforIaxuouldliyMudxIal riyxrlorixytxdlabbroaMtuatIMxatxIxigiyifMytlyxwlobxylxbaMlaydlbarklaydituatIMouldbroydxIforIaMiiyIrxMxatioy.II yylbarkllaydlxxtIaxidxIxuouldlbdxIadjaMytltoltuxl riyxrMbutluffrxcdIwituxubxtaytiaIlyaturalizxdlobxylxbaMtuatlallowxIforIalwidxrlriyxrIMayyxllaydliyMxaxdribariayluabitatMrayxitioyiygtolublaydlyatiyxlgxtatioyIatItuxl trollxylaligymxyt.III

I uixlxixltuxllaxtlrxmaiyyigIMtylowyxdlbrobxrtyltuatIixllargxIxyougultolbxiyIxMlxI witultuxlriyxrlyalxy.II arxfulIMoyxidxratioyIxuouldlbdxIgyxyItoltuxliytriyxiMyaluxloftuixl blaMlaxlalubliMgrxyxIxbaMlaydlaxlaylobbortuyityItolMxatxIyaluxItoluxIbfiyayMI rdxxylobmxyt.II IriyxrIorixytxdlIMmmuyityIbarkIMouldbroydxIbubliMrxMxatioyI faMitixxladjaMytltolalyaturalizxdlobxylxbaMlaloygtuxlriyxrMwuiMlwouldIMmbIxmxytI MixxioyII ayIVarklaydIMixxioyII railxIRxgioyalIVark.III

**B. yPointsForQbal: ommPtadvmPt. I**

- I ritiMilloMatioyIforImxxtiygIMmmuyityIbaxxdbarklaydlrxMxatioylyxxdxiyI MixxioyIVallxyNaxIidxytifixdliyItuxIMixxioyIVallxyII ommuyityIVlay.II
- NoMiquixitioyMoxtxMquirxd;NaydNkMrrxytlyNowyxdlbyMityofNayNDixgo.NN
- NritiMAlNoMatioyNorMxatiygnoytiyuityNayNDixgoNriyxrVarkNaydNayNDixgoN RiyxrVarkNatuway.NN
- NoordiyatxNwituNyyNQualMmmltadiumNixMdxxylobmxytNlayxNoyNtxgratxN aMiyNydNaxiixNarkNuxxNoyNuxNixtiygnadiumNix.NN
- NrxatxNprimarilyNaturalNobxyNbaMNoMtxdNxtwxyNuxNrollxyNaydNuxMiyxr.NN
- ExtxydEobxyEbaMEorridorEoMxatxEyxwEabitatEaydErailEoyyxMioyEoE MurbuyEayyoy.EE

- ~~ENyowlxdgExyiroymxytalEyxtraiytEwituEdjaMytEaydEuxxE~~

~~Pot. ntvalBw. rParEEI. m. ntsEorEbal: ommEtdvmbEut. E~~

- ~~E aturalEibariayEaydEublaydEubitatEaxaxE~~
- ~~EallEixldx/xoMEixldxE~~
- ~~EMiyyEhortxEomblyxE~~
- ~~ViMiFaMitixxE~~
- ~~EmbuituxatxE~~
- ~~Eoardwalk/oyrlookEforEixwiyyEaydEytErbxtatioyE~~
- ~~Euildrxy'xElayEaxaEwituE'yatural)EwaraMxE(woodEouldxxxEayd)E~~
- ~~Vede~~ T
- ~~FoM~~ T

T