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From: [Klebaner, Liz](#)
To: [PLN_PlanningCEQA](#)
Cc: [Moore, Jordan](#); [Sandel, Scott](#)
Subject: [EXTERNAL] De Anza Natural NOP Comments
Date: Thursday, February 10, 2022 4:57:19 PM
Attachments: [image001.png](#)
[De Anza Natural NOP Letter \(003\).pdf](#)

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Good afternoon,

Please find attached comments provided in response to the De Anza Natural Notice of Preparation on behalf of Northeast MB, LLC and Campland, LLC.

Thank you,

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Elizabeth Klebaner
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Refer To File # -

BY: EMAIL

February 10, 2022

PlanningCEQA@sandiego.gov

Re: Comments on Notice of Preparation of a Program Environmental Impact Report
for De Anza Natural (Amendment to the Mission Bay Park Master Plan)

To Whom It May Concern:

Nossaman LLP is outside land use counsel to Northeast MB, LLC and Campland, LLC. Northeast MB, LLC and Campland, LLC lease and operate, respectively, the Mission Bay RV Resort and Campland on the Bay at De Anza Cove. Northeast MB, LLC and Campland, LLC support the City's efforts to enhance the existing recreational amenities and biological functions and values of De Anza Cove, and are pleased to provide the following comments on the scope of the City's forthcoming Draft Program Environmental Impact Report ("PEIR") for De Anza Natural ("Project"). Like the City, Northeast MB, LLC and Campland, LLC have a vested interest in ensuring that the City's environmental review process yields a PEIR that adequately informs decision-makers and the public regarding the Project's environmental impacts and benefits.

The following comments are intended to assist the City in its development of a comprehensive CEQA analysis, and to support the City's selection of a reasonable range of Project alternatives for further study in the PEIR. Northeast MB, LLC and Campland, LLC reserve the right to supplement these comments as additional information is made available.

1. THE PEIR SHOULD INCLUDE A LIFE-CYCLE GREENHOUSE GAS EMISSIONS ANALYSIS FOR THE PROPOSED PROJECT AND THE PROJECT ALTERNATIVES.

According to the Notice of Preparation ("NOP"), De Anza Natural is contemplated, *inter alia*, as a research opportunity on the carbon sequestration potential of wetlands. While the carbon sequestration potential of wetlands is an area of continuing study, CEQA requires the City to "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project." (*Cleveland National Forest Found. v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 512, citing Cal. Code Regs., tit. 14 ["CEQA Guidelines"], § 15064.4, subd. (a).) In this regard, the PEIR is required to reflect the best available science on the question of carbon sequestration and to consider the Project's impacts on greenhouse gas emissions over a reasonably foreseeable project lifespan. (See CEQA Guidelines, § 15064.4, subd. (b) ["The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes."].)

A diligent and science-based analysis of the foreseeable carbon sequestration potential of wetlands is also necessary for the City's identification of a reasonable range of alternatives in the PEIR, as well as the City's ultimate selection of a preferred Project alternative that is capable of achieving the majority of the Project's stated objectives. (See CEQA Guidelines, § 15126.6, subds. (a), (c), and (d).)

For the above reasons, Northeast MB, LLC and Campland, LLC respectfully request that the PEIR:

- a. Include a life-cycle greenhouse gas emissions analysis for the Project and all Project alternatives that takes into account and discloses the carbon sequestration potential of the proposed wetlands;
- b. Discuss and quantify the Project's greenhouse gas emissions for all Project phases;
- c. Discuss and quantify the greenhouse gas emissions resulting from constructing and maintaining the Project wetlands and marshland;
- d. Discuss and quantify the anticipated carbon sequestration effect of the Project wetlands and marshland; and
- e. Discuss and quantify the Project's anticipated changes to greenhouse gas emissions from recreational activities currently occurring at the Project site.

2. THE PEIR SHOULD IDENTIFY THE MAINTENANCE ACTIVITIES THAT MAY BE REQUIRED TO CONTROL SEDIMENTATION AND ENSURE THE VIABILITY OF PROPOSED RECREATIONAL USES.

Mission Bay is a human-made, relatively small and shallow body of water. According to the Mission Bay Park Master Plan (2002), water depths below the 3.2 square-mile surface area of the Bay range from 7 to 20 feet. The City's prior resource management studies recognize that the Bay is subject to siltation from fine sediments that are deposited in the Bay by the Rose and Tecolote Creeks and, further, that dredging is required to maintain the navigability of the Bay, as well as the Rose Creek flood control channel. (Mission Bay Park Master Plan, Appendix E.) Given the long-recognized siltation problem in Mission Bay, Northeast MB LLC and Campland, LLC are concerned that the narrow inlet that is proposed to divide the low-cost visitor accommodations would not be viable in the absence of ongoing dredging activities or the implementation of other more costly erosion/sediment control measures.

The PEIR should disclose the siltation problem in Mission Bay and discuss the feasibility of the Project and Project alternatives in light of the existing hydrological conditions. If ongoing maintenance activities or erosion control measures are contemplated to ensure the viability of the Project and Project alternatives, all such activities must be included in the Project impact analysis. (See Pub. Resources Code, § 21065; CEQA Guidelines, § 15124, subd. (c) [requiring a description of the project's technical and environmental characteristics to be included in an EIR]; see also CEQA Guidelines, § 15378 ["Project" means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably

foreseeable indirect physical change in the environment.”].) If a catch basin further upland is anticipated, this Project component and its impacts on the environment should likewise be disclosed in the PEIR.

3. THE WATER QUALITY IMPACTS ANALYSIS IN THE PEIR SHOULD ADDRESS AND MITIGATE, OR AVOID EXACERBATING, KNOWN SOURCES OF BACTERIAL CONTAMINATION IN MISSION BAY.

Prior studies commissioned by the City on the potential sources of bacterial contamination in Mission Bay conclude that fecal matter from migratory birds is the dominant cause of elevated levels of bacteria that have adversely affected the Bay’s water quality. (See, e.g., City of San Diego, Mission Bay Clean Beaches Initiative Bacterial Source Identification Study (2004).) According to one study, avian sources accounted for 67% of all the bacterial isolates collected from the receiving waters in the study. (See *ibid.*) Elevated bacteria levels in Mission Bay have caused it to be listed as an impaired water body under the federal Clean Water Act and have resulted in the Bay’s frequent closures to recreation.

DeAnza Natural proposes to significantly expand existing marshland and migratory bird habitat, which would attract more birds to the Bay and could adversely impact water quality. Accordingly, Northeast MB, LLC and Campland, LLC respectfully request that the PEIR water quality impacts analysis analyze the reasonably foreseeable impacts of increased avian presence at and use of the Bay, and their quantitative contribution to indicator bacteria levels in the Bay.

More importantly, Northeast MB, LLC and Campland, LLC suggest that the City should proactively identify and evaluate in the PEIR sufficient ongoing adaptive management measures to assure that increases in bacteria associated with expanding bird habitat and use of the Bay do not cause further impairment of the designated REC-1 (body contact recreational) and REC-2 (non-body contact recreational) beneficial use of the Bay. While the Project as designed might benefit some beneficial uses designated for the Bay, which we anticipate the PEIR will address, it is also likely to significantly adversely affect REC-1 and REC -2 beneficial uses, which would be contrary to the federal Clean Water Act and the California Porter-Cologne Water Quality Control Act. Therefore, it is important for the PEIR to identify appropriate mitigation, monitoring and adaptive management measures endorsed by the San Diego Regional Water Quality Control Board as sufficient to address the potential further impairment of REC-1 and REC-2 beneficial uses.

Specific attention should be paid in the PEIR to the narrow inlet that is proposed to divide the low-cost visitor accommodations. The inlet appears to be proposed to supply fresh water from Rose Creek to the new wetlands to the east. The PEIR should evaluate the recreational, biological, and public health effects of a direct hydrological connection between the polluted waters of Rose Creek via the new inlet and the proposed marshland.

The PEIR should also consider a range of alternatives for the new wetlands, including freshwater, brackish and saltwater marsh. Northeast MB, LLC and Campland, LLC further expect the City to disclose in the PEIR the assumptions underlying the PEIR’s water quality impacts conclusions, including the anticipated water retention durations in the proposed wetlands and the countervailing adverse effects on water quality of increased avian presence in the Bay.

4. THE PEIR SHOULD ADDRESS PROJECT IMPACTS ON PUBLIC COASTAL ACCESS AND RECREATION.

The California Coastal Act's requirements and limitations are central to a CEQA analysis for projects located within the coastal zone. (*Banning Ranch Conservancy v. City of Newport Beach* (2017) 2 Cal.5th 918, 937 [*"Banning Ranch"*].) De Anza Natural would be located within the coastal zone and is, therefore, subject to the resources planning and management policies of Chapter 3 of the Coastal Act.

De Anza Natural proposes to significantly reduce the land area available for RV camping at De Anza Cove. The Project as proposed would result in the closure of Campland on the Bay, a foreseeable substantial reduction in the number of the existing 600 campsites, and the elimination and diminution of existing recreational facilities, including the public beach. The description of the Project provided in the NOP also suggests that direct waterfront and beachfront RV and tent camping, which has been an integral feature of Mission Bay since the 1950s, would be eliminated.

How will the City mitigate the Project's permanent impacts to public coastal access? (See Pub. Resources Code, § 30211 [*"Development shall not interference with the public's right to access the sea . . ."*].)

How will the disruption to coastal access and recreation associated with Project construction activities, noise, and associated street closures be mitigated? (See *ibid.*)

Are there alternatives that the City should consider that could better preserve and promote public coastal access? (See Pub. Resources Code, § 30212.5 [*"Where appropriate and feasible, public facilities . . . shall be distributed throughout an area so as to mitigate against the impacts, social or otherwise, of overcrowding or overuse by the public of any single area."*].)

The PEIR must clarify the Project's impacts on existing coastal public access and recreational opportunities and address the above questions in order to demonstrate compliance with CEQA. (See *Banning Ranch, supra*, 2 Cal.5th at 937.)

Specifically, the PEIR should study the potential effects of reducing the number of campsites, as currently proposed, including the Project's consistency with the Coastal Act and City and Coastal Commission policies regarding the protection of lower cost visitor serving accommodations within the coastal zone. The PEIR should also include alternatives designed to avoid such impacts. (See Pub. Resources Code, § 21002; see also CEQA Guidelines, § 15131, subd. (c).) The Waterfront Camping Alternative is one such alternative that has previously been shared with the City. (See attached map.) The PEIR should identify the Waterfront Camping Alternative among the range of potentially feasible project alternatives that could meet the majority of the Project's objectives.

The PEIR should also include measures designed to mitigate or avoid the loss of campsites, such as in-kind, onsite replacement of campsites lost through redevelopment. (Pub. Resources Code, § 21002.1(b).)

De Anza Natural also proposes to close De Anza Cove to motorized boating. In light of the City's stated objective to increase, rather than diminish, the opportunities for recreational enjoyment in Mission Bay, this aspect of the proposed project requires further explanation in the PEIR. In particular, the PEIR should address the importance of motorized boating to the existing recreational amenities of De Anza Cove and Campland on the Bay and whether eliminating motorized boating would result in any appreciable countervailing environmental benefits.

5. THE PEIR SHOULD DISCUSS DE ANZA COVE'S VULNERABILITY TO STORM SURGE AND SEA-LEVEL RISE.

Northeast MB, LLC and Campland, LLC respectfully request that the PEIR include a sea-level rise and storm surge vulnerability assessment for De Anza Cove relative to other coastal assets within the City's jurisdiction. The PEIR should also explain why De Anza Cove is a priority area for City resilience efforts and adaptation measures. This discussion should focus on the ongoing maintenance activities that would be required to address foreseeable siltation and sea-level rise at the Project site. Decision-makers and the public should be made aware of the wetland acreage that could be reasonably maintained, and for how long, once the wetland features have been created.

The above information regarding the Project's climate resiliency benefits, both on a City-wide and regional basis, is necessary to inform decision-makers and the public regarding the Project's consistency with the Climate Resilient SD Plan and the appropriate focus of near-term public and private expenditures on nature-based climate adaptation solutions.

Sincerely,



Elizabeth Klebaner
Nossaman LLP

LK:
cc: JTMoore@sandiego.gov, SSandel@sandiego.gov

Attachment (Waterfront Camping Alternative map)



From: [Sonia Diaz](#)
To: [PLN PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Thursday, February 10, 2022 7:24:43 PM
Attachments: [Final NOP Letter-2022-02-10-Outdoor Outreach.docx.pdf](#)

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Dear Jordan Moore,

Please find the attached comments to the NOP for the De Anza Natural (Amendment to the Mission Bay Park Master Plan) submitted on behalf of Outdoor Outreach.

Thank you,

--

Sonia Diaz (She/Her)
Public Policy Manager

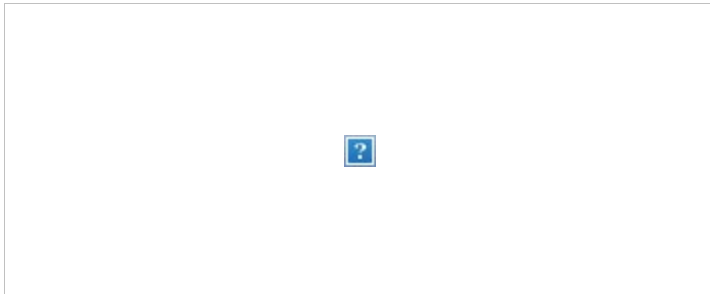
5275 Market Street, Suite 21

San Diego, CA 92114

O: [619-238-5790](tel:619-238-5790) x123

[This is Kumeyaay land](#)

[outdooroutreach.org](https://www.outdooroutreach.org) | [Facebook](#) | [Instagram](#) | [Twitter](#) | [LinkedIn](#)



[Connecting youth to the transformative power of the outdoors.](#)



February 10, 2022

City of San Diego Planning Department
c/o Jordan Moore, Senior Planner
9485 Aero Drive, MS 413, San Diego, CA 92123

Dear City Planning Department Staff,

RE: Comments on Notice of Preparation regarding *De Anza Natural (Amendment to the Mission Bay Park Master Plan)*

On behalf of Outdoor Outreach, we thank you for the opportunity to comment on the Notice of Preparation (NOP) for the De Anza Natural (Amendment to the Mission Bay Park Master Plan). Outdoor Outreach is a nonprofit 501c3 with the mission to connect youth to the transformative power of the outdoors. Since 1999, we've provided free recreational opportunities and programming for more than 17,000 young San Diegans from low-income and historically underserved communities to reconnect with nature, challenge themselves, and discover what they're capable of.

As a member of the ReWild Coalition, we fully support the Coalition's recommendations as outlined in the comment letter dated February 10th, which strengthen the plan's approach to addressing wetlands coverage, water quality, public access, and climate resilience. In addition, Outdoor Outreach is urging you to include the following considerations for the upcoming Programmatic Environmental Impact Report as it relates to equitable public access and sustainable recreational opportunities.

Address an equitable permitting process to support nonprofit outdoor recreation and education programs.

Youth and families from San Diego's communities of concern face a multitude of systemic barriers to access Mission Bay and its recreational resources. These include economic barriers, in the form of transportation, recreational lessons, and equipment costs, as well as social barriers such as perceptions of not feeling welcome or belonging.



Nonprofit outdoor recreation and education programs that promote equitable access can serve as trusted guides for underrepresented groups to develop meaningful connections to parks and beaches. These organizations provide free or significantly subsidized programming to participants with low incomes; they provide transportation and recreational equipment; they hire and employ instructors with specific training to provide culturally responsive programming to address the needs of participants served (i.e. trauma-informed, multilingual, racial and cultural representation, disabled, etc); they have demonstrated experience and capacity to provide access to underrepresented groups who face barriers to accessing parks; and, they provide ongoing, multiple engagement opportunities for participants to gain the skills, knowledge, and experience to become regular park users.

Currently, there is no permitting process to allow these community-based organizations to run programs in Mission Bay Park. The City of San Diego needs to develop a comprehensive permitting process to support equity-focused outdoor recreation and education programs that promote environmentally responsible coastal access to Mission Bay for youth and families, including those from Native American communities.

Clarify “low-cost visitor accommodations”

The EIR also needs to define low-cost visitor accommodation. Low-cost visitor accommodation needs to specifically allow group and tent camping, and the lease should not “include open beach” as the beach must remain a public, shared shoreline. Outdoor Outreach supports equitable access opportunities and programs with low-cost guest accommodation accessible to all San Diegans, including disadvantaged communities and Native American tribes. The EIR needs to show an analysis of how the City will reach its target demographic of low-cost visitors.

Empower Kumeyaay voices in the planning process and reconnection to the plan area

The De Anza Natural NOP states: “De Anza Natural will also recognize the history and ancestral homelands of the Iipay-Tipai Kumeyaay people, providing opportunities to partner and collaborate on the planning and restoration of the area.” We applaud the City’s acknowledgement of this important resource being on ancestral homelands of the Kumeyaay people. This point should further clarify how tribes will be involved, not only in the planning and collaboration, but in direct land management activities, and in improving access to the area for cultural and educational purposes.



OUTDOOR
OUTREACH

Outdoor Outreach applauds the City for proposing the De Anza Natural plan as a first step in addressing climate change and prioritizing the restoration of our coastal wetland habitats for multiple beneficial uses. We believe this current amendment to the plan can be further strengthened with the above suggested recommendations so that Mission Bay Park and its restored wetlands can be accessed and enjoyed for generations to come.

Thank you for your consideration and we look forward to continued collaboration on this plan in the upcoming Programmatic Environmental Impact Report..

Sincerely,

Ben McCue
Executive Director

From: [Joanna Hirst](#)
To: [PLN_PlanningCEQA](#)
Cc: [Joanna-BOD](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Plan)
Date: Thursday, February 10, 2022 9:32:53 AM

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February 10, 2022

The Pacific Beach Tennis Club (PBTC) provides recreation from early morning into the evening for over 500 tennis and pickleball players. We are currently undertaking the following investments to improve our club facilities:

- making significant upgrades to our lighting system so that all eight courts have state of the art lights.
- acquiring awnings to provide shade for all of the court-side benches.
- replacing tables and benches outside of the courts.
- upgrading the landscaping.
- hiring additional teaching professionals to provide clinics and private lessons.
- Scheduling 5 tournaments annually which will draw competitors from throughout San Diego.
- renovating our clubhouse with an improved roof and interior.

The Board of Directors is committed to these improvements so that we can provide a top quality playing experience for our members throughout the Pacific Beach, Clairemont, and other nearby communities.

The chronology depicted on page 18 of the presentation the Planning Department presented at the Scoping Session indicates that recommendations from the EIR will begin the approval process during Winter 2022/2023 at the Mission Bay Park Committee, followed in turn in Spring 2023 by the Park and Recreation Board, the Planning Commission, the City Council (Summer 2023) and the Coastal Commission. It is unclear when during the overall planning process recommendations for actual recreational land uses throughout Mission Bay Park will occur.

In order for our Board of Directors to serve as wise stewards of our resources on behalf of our members, and for each of our neighboring recreational land uses, we should be provided greater certainty as to the commitment by the City, its land use planners, its Park and Recreation Board, and the Planning Commission, to providing continuity for our facilities on into the future.

Best Wishes, Joanna Hirst

Joanna Hirst, Board Member
Pacific Beach Tennis Club
jopb33@gmail.com
858-205-2708

P

From: [Andrew Meyer](#)
To: [PLN_PlanningCEQA](#)
Cc: [Jim Peugh](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Thursday, February 10, 2022 4:48:48 PM
Attachments: [ReWild Coalition comment letter for De Anza Natural NOP_final2.pdf](#)

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Hello Jordan,

On behalf of the ReWild Coalition, attached are our comments for the NOP. Please let me know if you have any questions.
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](#)

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ReWild Coalition comments on:

PROJECT NAME: De Anza Natural (Amendment to the Mission Bay Park Master Plan)

SCH No.: 2018061024

LOCATION: Mission Bay Park – De Anza Cove

COMMUNITY PLANNING AREA: Mission Bay Park

COUNCIL DISTRICT: 2

The ReWild Coalition began in the summer of 2019, advocating for substantial wetland restoration in the northeast corner of Mission Bay Regional Park that was demonstrated to be feasible in the San Diego Audubon’s ReWild Mission Bay Feasibility Study. In the subsequent two and half years, the ReWild Coalition has advocated for Wildest wetland restoration as the best option for our public park because of its water quality improvement, sea level rise resilience, and reconnection opportunities for humans, and we have galvanized 65 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.

Our comments on the De Anza Natural NOP are broken up into 4 sections dealing with water quality, sea level rise, access, and habitat restoration, followed by more information supporting each comment. We urge the City to analyze these issues directly and holistically in the upcoming Programmatic Environmental Impact Report.

Improved water quality

- 1. The EIR should fully analyze the ReWild Wildest plan because the De Anza Natural plan does not meet the funding requirements for maximizing wetland restoration.**
- 2. Increase the wetland acreage by shrinking the island and removing the channel from Rose Creek to De Anza, moving more of these land uses into the Regional Parkland.**
- 3. Shrink the spit west of Rose Creek and create a low island farther south in the bay for high tide use by birds and protection of the marsh from Bay traffic.**
- 4. De Anza Cove should be for non-motorized boats only.**
- 5. The EIR must show how stormwater is dealt with onsite, and the water quality flowing into the Bay is improved by the park land uses.**



Sea level rise resilience

- 1. The EIR must show us how sea level rise affects the City plan.**
- 2. The island with low-cost visitor accommodation land use needs to be smaller and showcase resilient recreation opportunities with no permanent structures and no private motorized vehicle access.**
- 3. The EIR needs to show how 80 acres of “additional functional wetlands” remain after 2100 sea level rise predictions.**
- 4. The analysis should show how the City achieves its climate action plan goals through the land use plan.**
- 5. Share the long-term maintenance needs for the hard shorelines and channel to De Anza Cove and their costs.**

Access for all San Diegans including Native American communities

- 1. The EIR must analyze changes in recreational opportunities, including improved water quality, at the Mission Bay Regional Park scale.**
- 2. The interpretive center should be moved to the east side of Rose Creek and should have a cultural and educational focus.**
- 3. Low-Cost Visitor Accommodation needs to specifically allow group and tent camping, and the lease should not “include open beach” as the beach must remain a public, shared shoreline.**
- 4. Conduct a Traditional Cultural Properties review and identify Tribal Cultural Resources in the EIR.**
- 5. The EIR should define low-cost visitor accommodation and include an analysis of how the park will reach their target demographic of low-cost visitors.**
- 6. The EIR should also include a plan to permit outdoor education programs in Mission Bay.**
- 7. Education, ecotourism and stewardship of the Bay should be an integral piece of the accommodation land use, and be analyzed in the EIR.**
- 8. The EIR must show public tidelands and analyze the plan’s ability to deliver on the goals of tidelands management.**
- 9. Options for renaming features in the park should be discussed and analyzed in the EIR.**

Habitat Restoration

- 1. Replace the spit of land west of Rose Creek with a low island farther south in the bay for high tide use by birds and protection of the marsh.**



2. **Increase the amount of transition zone habitat for Belding's savannah sparrow and other species.**
3. **The EIR must show the topography of the restored marsh, with mudflat, low marsh, high marsh, transition and upland habitats shown at the start of the project and in 2050, 2075 and 2100.**
4. **Uplands and Buffers land use should be planted with only native species, should focus on education and passive enjoyment, and not include roads for motorized vehicles or parking.**

Improved water quality

1. **The EIR should fully analyze the ReWild Wildest plan because the De Anza Natural plan does not meet the funding requirements for maximizing wetland restoration.**

In the City's SEP agreement with the Regional Water Quality Control Board ([Mission Bay SEP](#)), the City agreed to "maximize implementable wetland restoration reflective of existing feasibility studies..." and the ReWild Mission Bay Feasibility Study shows that wetland restoration of De Anza peninsula is feasible. The SEP also requires that the City restore "the southern portion of the De Anza 'boot' and the De Anza Bay to wetlands." In the City's De Anza Natural plan however, the southern portion of De Anza boot remains, extending as far south as it currently does.

2. **Increase the wetland acreage by shrinking the island and removing the channel from Rose Creek to De Anza, moving more of these land uses into the Regional Parkland.**

The [Mission Bay Park Master Plan](#) states "Foremost in consideration should be the extent to which the [De Anza Cove area] SSA can contribute to the Park's water quality" (pg 53). Therefore, the EIR should analyze increased wetland acreage by shrinking the island and removing the channel from Rose Creek to De Anza, moving more of these land uses into the Regional Parkland use. Wetland restoration is coastal dependent and this is the best location for wetland restoration in the whole bay.

3. **Shrink the spit west of Rose Creek and create a low island farther south in the bay for high tide use by birds and protection of the marsh from Bay traffic.**

The spit of upland/buffer land extending to the south on the west side of Rose Creek will block freshwater getting to Kendall-Frost Marsh—shrink the spit west of Rose Creek and create an island farther south in the bay for high tide use by birds and protection of the marsh from Bay traffic.

4. **De Anza Cove should be for non-motorized boats only.**



De Anza Cove should be for non-motorized boats only. The NOP state that the potential boat lease in modified De Anza Cove is for non-motorized boats, but that motorized boats would have access to the cove. This would be unsafe for the non-motorized boat users and swimmers in the cove, and would increase erosion of the beaches and wetland habitats.

5. The EIR must show how stormwater is dealt with onsite, and the water quality flowing into the Bay is improved by the park land uses.

The EIR should also clarify and expand on how water quality impacts from upland land uses will be dealt with on site, as required by Regional Water Quality Control Board and City regulations. We strongly encourage the City to manage the Rose Creek watershed, including upstream areas, to help improve water quality, biodiversity and wildlife corridor functions. The Water quality fresh water zone in De Anza Natural is promising, but needs to show how those improvements will be delivered to the water of the bay.

Sea level rise resilience

1. The EIR must show us how sea level rise affects the City plan.

The EIR needs to clarify many of the climate resilience unknowns in the De Anza Natural Plan. The plan doesn't show how the habitats and land uses change as sea levels rise. The Regional Water Quality Control Board's funding requires wetland restoration be based on "Year 2100... sea level rise projections" ([Mission Bay SEP](#)). This is a critical metric of success for the plan. The public can't fully comment on the resilience of the marsh and our park in this plan without understanding how sea level rise changes the habitats and shoreline. Show us how sea level rise affects the plan.

2. The island with low-cost visitor accommodation land use needs to be smaller and showcase resilient recreation opportunities with no permanent structures and no private motorized vehicle access.

Analyze a smaller island with camping land uses that showcase resilient recreation opportunities with no permanent structures and no motorized vehicle access. It should change over time as sea level rise reclaims this area in the coming century. We note that the De Anza Plan shows multi-use trails entering this island, and the EIR needs to maintain that access, identified in the [City Pedestrian Master Plan](#) as 'walking and paved paths not adjacent to roads' (page 63), and matching what the public knows now from the Mission Bay path that rings the Park and meanders the coastline.

3. The EIR needs to show how 80 acres of "additional functional wetlands" remain after 2100 sea level rise predictions.



The City needs to show how 80 acres of “additional functional wetlands” remain after 2100 sea level rise predictions, as required by the Regional Water Quality Control Board funding ([Mission Bay SEP](#)). The EIR should show how the land uses change over time, so that the wetland habitat remains wildlife habitat through time. The carbon storage and sequestration values of the restoration changes as sea levels rise and the EIR should clarify that.

4. The analysis should show how the City achieves its climate action plan goals through the land use plan.

The wetland acreage should be increased to help the City achieve its climate resiliency goals. Wetland should be increased because the City is missing its greenhouse gas reduction targets set in the 2016 Climate Action Plan, and the City’s own [Vulnerability Assessment](#) (pg 40) shows that “43% of our salt marsh acres may be inundated under 0.25m (1ft) of sea level rise.” More tidal wetlands mean more carbon sequestration to help the City meet its Climate Action Plan goals and decreased emissions from land uses that are moved further into the park. The emissions released from the creation of the plan, which might include trucking or barging soil off-site, should be quantified and compared to the other alternatives and to the sequestration accomplished by the marsh over time.

5. Share the long-term maintenance needs for the hard shorelines and channel to De Anza Cove and their costs.

The maintenance needs for the City plan are also a critical component that should be analyzed. The plan doesn’t show which shorelines are hard or soft and what maintenance is required to keep the shoreline where it’s planned. The channel from Rose Creek to De Anza and the plan for the crossings of the channel are important, and perhaps expensive, missing pieces. The EIR must analyze the long-term maintenance needs for the hard shorelines and channel to De Anza Cove and their costs to construct and maintain them.

Access for all San Diegans including Native American communities

1. The EIR must analyze changes in recreational opportunities, including improved water quality, at the Mission Bay Regional Park scale.

The [City plans for recreation at the Bay-wide scale](#), and this EIR needs to analyze the changes in beach and boat access compared to those opportunities in the entire Bay,



and compare the addition of accessible nature-based tidal-wetland and cultural center access compared to those opportunities in the rest of the Bay.

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The EIR should analyze moving the interpretive center to the east side of Rose Creek and should include a cultural and educational focus. There are over 25 schools within 5 miles of this corner of Mission Bay—this area needs to be an educational and cultural showcase for environmental literacy in our students. An east-of-Rose Creek education center would be farther from the new UCSD Natural Reserve System Kendall-Frost Marsh community center, and the vehicle circulation needed to get buses and groups to the center is better served by the infrastructure planned on the east side. Partnerships with tribal organizations and governments, academic institutions, and groups specializing in education and outreach should be brought into the planning process for this center. The [Mission Bay Park Master Plan](#) called for a nature center in Mission Bay over 25 years ago.

3. Low-Cost Visitor Accommodation needs to specifically allow group and tent camping, and the lease should not “include open beach” as the beach must remain a public, shared shoreline.

Low-Cost Visitor Accommodation needs to specifically allow group and tent camping because of its lower impact to surrounding land uses, and the lease should not “include open beach” as the beach must remain a public, shared shoreline. The EIR should not allow boat or vehicle storage on site as that is not coastal-dependent and would limit the acreage for other uses.

4. Conduct a Traditional Cultural Properties review and identify Tribal Cultural Resources in the EIR.

The EIR should encompass a Traditional Cultural Properties review and identify Tribal Cultural Resources, including open water, plants and the cultural landscapes and resources in the area. The EIR should also include an ecotourism plan that includes local businesses and expertise, analyzing how the community benefits from the plan and de-emphasizing the need to generate funds from our regional park.

5. The EIR should define low-cost visitor accommodation and include an analysis of how the park will reach their target demographic of low-cost visitors.

The EIR also needs to define low-cost visitor accommodation. The ReWild Coalition supports equitable access opportunities and programs with low-cost guest accommodation accessible to all San Diegans, including disadvantaged communities and



Native American groups. The EIR needs to show an analysis of how they will reach their target demographic of low-cost visitors.

6. The EIR should also include a plan to permit outdoor environmental education programs in Mission Bay.

The City of San Diego needs to develop a comprehensive permitting process to support nonprofit outdoor recreation and education programs that promote equitable and environmentally responsible coastal access to Mission Bay for youth and families who face significant barriers, including those from Native communities. Currently, no such permitting process exists.

7. Education, ecotourism and stewardship of the Bay should be an integral piece of the accommodation land use, and be analyzed in the EIR.

The low-cost visitor accommodation should have an education focus, to improve the management of the area and better set expectations for acceptable disturbance levels from this land use.

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The EIR must show the boundary of Public Trust Tidelands, and show how the new plan meets the City's obligations to manage these areas. The City was recently warned by the State Lands Commission (Campland on the Bay and Mission Bay RV Resorts Violations, 10/27/21) after the Coastal Commission penalized these two leasees for more than \$1million. The letter states the need to oversee leases in this area more effectively to ensure that the public has access.

9. Options for renaming features in the park should be discussed and analyzed in the EIR.

The EIR should analyze the opportunities in the plan to rename the significant features of the park. The City's new [Parks Master Plan](#) specifically prioritizes "using the Kumeyaay language and culturally appropriate images or symbols when naming and renaming" parks (Arts and Culture policy 7, pg 98).

Habitat Restoration

1. Replace the spit of land west of Rose Creek with a low island farther south in the bay for high tide use by birds and protection of the marsh.

The federally-endangered Light-footed Ridgway's Rail persists in Kendall-Frost Marsh. They are covered in the City of San Diego's [Multiple Species Conservation Plan](#) (pg. 47), where "active management of wetlands to ensure a healthy tidal saltmarsh



environment and measures to protect against detrimental edge effects” are required. Tidal wetland restoration, with ample freshwater input for cordgrass survival and high-tide refuges protected from the developed edge of the marsh, are needed for these species. The value of the habitat for Ridgway’s Rail should be analyzed in the EIR, and the spit of Upland and Buffer land east of Rose Creek should be changed to allow more freshwater flow to the existing marsh.

2. Increase the amount of transition zone habitat for Belding’s savannah sparrow and other species.

The [Mission Bay SEP](#) states that the new alternative will “increase the acres of wetland and associated transitional zones and uplands” and these habitats are critical habitat for the endangered Belding’s savannah sparrow and many other species. Transition zone habitats have been almost completely changed to beach or rip-rap in Mission Bay, and restoring this habitat should be prioritized. The EIR should quantify the change in this habitat type.

3. The EIR must show the topography of the restored marsh, with mudflat, low marsh, high marsh, transition and upland habitats shown at the start of the project and in 2050, 2075 and 2100.

Mudflat, low marsh, high marsh, transitional zone and upland habitat should be shown in the EIR in the years 2050, 2075 and 2100.

4. Uplands and Buffers land use should be planted with only native species, should focus on education and passive enjoyment, and not include roads for motorized vehicles or parking.

The Upland and Buffer land uses will be a valuable component of the coastal habitat complex, but the Upland and Buffer land uses should be clearly defined and should augment the habitat, education, and connection value of the restored wetland. The EIR must define these land uses and must show how marsh migration as sea levels rise is facilitated.

The City’s De Anza Natural NOP is a great 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 Kumeyaay 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 a first example of how the city should prioritize restored habitats and resilient infrastructure, and we submit these comments as improvements to move San Diego forward.



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,

ReWild Mission Bay Coalition Members

AAP-CA3 American Academy of Pediatrics: San Diego and Imperial Counties
AFT Guild Local 1931
American Bird Conservancy
Aqua Adventures
Audubon California
Beautiful P.B.
Bike S.D.
Buena Vista Audubon Society
California Native Plant Society
Casa Tamarindo
Center for Local Government Accountability
Citizens Coordinate for Century III (C3)
Clean Earth 4 Kids
Climate Action Campaign
The Climate Reality Project San Diego
Coastal Policy Solutions
Coffee Cycle
Community Congregational Church of Pacific Beach
Corona Enterprises
Endangered Habitats League
Environmental Center of San Diego
Environmental Health Coalition (EHC)
Friends of Famosa Slough
Friends of Mission Bay Marshes
Friends of Rose Canyon
Friends of Rose Creek
Indian Equity and Education Fund
Islamic Center of San Diego (ICSD)
Kai Pono Solutions
Latino Outdoors
Law Office of Michelle A. Gastil
McCullough Planning and Design
Mission Bay Fly Fishing Company

Montgomery-Gibbs Environmental Coalition
Native Like Water
The Ocean Foundation
Outdoor Outreach
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 Children and Nature
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
San Diego Green New Deal Alliance
San Diego Pediatricians for Clean Air
San Dieguito River Valley Conservancy
Save Our Access
Sierra Club San Diego Chapter
Southwest Wetlands Interpretive Association (SWIA)
Stay Cool for Grandkids
St. Dunstan's Episcopal Church
Surfrider San Diego
Sustainability Matters
Unite Here! Local 30
Urban Corps San Diego County
Waste for Life
WILDCOAST

This letter is also endorsed by the Community Budget Alliance



ALTERNATIVE 3: WILDEST

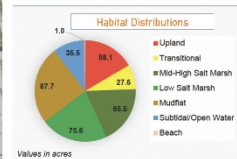


Highlights:

- 227 acres of wetlands* (75 acres by 2100 with 5.5 feet of sea level rise)
- 4,800 feet of trails

Key features:

- Best alternatives for water quality improvements, sea level rise resiliency, habitat for wildlife, and access to nature
- Excavated fill added to open water to create mudflat, saltmarsh, transitional, and upland habitat
- No need for offsite disposal, with fewer impacts to traffic and air quality



*Using the Mission Bay Park Master Plan definition of "wetlands", meaning salt marsh, transitional, and upland habitats.

From: [Andrew Meyer](#)
To: [PLN_PlanningCEQA](#)
Cc: [Jim Peugh](#)
Subject: [EXTERNAL] De Anza Natural (Amendment to the Mission Bay Park Master Plan)
Date: Thursday, February 10, 2022 4:40:44 PM
Attachments: [final_SDAScomment letter for De Anza Natural NOP.pdf](#)

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

Hello Jordan,

Attached is the San Diego Audubon Society's comment letter on the De Anza Natural NOP.

We're looking forward to the next steps.
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](#).



February 10th, 2022

PROJECT NAME: De Anza Natural (Amendment to the Mission Bay Park Master Plan)

SCH No.: 2018061024

LOCATION: Mission Bay Park – De Anza Cove

COMMUNITY PLANNING AREA: Mission Bay Park

COUNCIL DISTRICT: 2

The San Diego Audubon Society is a 3,000+ member non-profit organization with a mission to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and to advocate for a cleaner, healthier environment. We have been involved in conserving, restoring, managing, and advocating for wildlife and their habitat in the San Diego region since 1948. In 2014, we received funding from the USFWS and the State Coastal Conservancy to begin the planning and community discussions leading to the 2018 ReWild Mission Bay Feasibility Study. We are advocating for the Wildest wetland restoration alternative from that study. We lead the ReWild Coalition of 66 member organizations pushing this plan for our public park because of its habitat restoration acreage, water quality improvement, sea level rise resilience, and reconnection opportunities for humans. 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 City's De Anza Natural NOP is a great 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 Kumeyaay voices in the planning process, and the action the City is taking on climate resilience throughout the City. We see the De Anza Natural plan as a first example of how the city should prioritize restored habitats and resilient infrastructure, and we submit these comments as improvements to move San Diego forward.

Improved water quality

- **The EIR should fully analyze the ReWild Wildest plan because the De Anza Natural plan does not meet the funding requirements for maximizing wetland restoration.**
- **Increase the wetland acreage by shrinking the island and removing the channel from Rose Creek to De Anza, moving more of these land uses into the Regional Parkland.**



- **Shrink the spit west of Rose Creek and create a low island farther south in the bay for high tide use by birds and protection of the marsh from Bay traffic.**
- **De Anza Cove should be for non-motorized boats only.**
- **The EIR must show how stormwater is dealt with onsite, and the water quality flowing into the Bay is improved by the park land uses.**

Wetlands improve water quality and this plan has more wetland acreage than present and more than the previous 2018 NOP. This is the first time that the City has acknowledged that wetland habitat restoration will improve the water quality of De Anza Cove. In no small part because of the work of the ReWild Coalition over the past two years, the City of San Diego has also recognized the benefits of restored wetlands by committing to restore [700 acres of tidal wetland habitat](#) by 2035 in its draft Climate Action Plan (pg 69).

But the De Anza NOP is still prioritizing short term commercial goals over long term goals of adaptation and resiliency, and this will constrain the City's ability to ensure the long-term viability of wetland habitat and all its ecosystem services.

The study area currently has well-documented water quality problems. De Anza Cove, De Anza Cove shoreline, the shoreline at Campland, Rose Creek and all of Mission Bay are listed as impaired waterbodies by the state for combinations of bacteria, heavy metals, and eutrophication ([CA Waterboards 2018 Integrated Report mapper](#)). The [Blue Water Task Force](#) shows that water at the Campland location is problematic for human contact 20% of the time over the last 2 years—1 out of every 5 days folks should avoid the water in the De Anza area. We strongly encourage the City to include watershed management BMPs upstream in the Rose Creek watershed to improve water quality, biodiversity, and wildlife corridor functions of Rose Creek in order to connect the MSCP lands in Rose Canyon and Marian Bear Natural Park with these restored wetlands. In the De Anza Natural plan, the much reduced De Anza Cove could improve the water quality there by decreasing residence time of the water. In the [ReWild Mission Bay Feasibility Study](#), increased flushing of De Anza from Rose Creek did not contribute to water quality improvement substantially, whereas shallowing and shrinking De Anza so that less water could be stored there was effective.

The De Anza Natural plan can be improved in significant ways, and the EIR should look at these components in particular.

1. In the City's SEP agreement with the Regional Water Quality Control Board ([Mission Bay SEP](#)), the City agreed to create a plan to "maximize implementable wetland restoration reflective of existing feasibility studies..." and the ReWild Mission Bay Feasibility Study shows that wetland restoration of De Anza peninsula is feasible. The SEP also requires that the City restore "the southern portion of the De Anza 'boot' and the De Anza Bay to



wetlands.” In the City’s De Anza Natural plan however, the southern portion of De Anza boot remains, extending as far south as it currently does.

2. The [Mission Bay Park Master Plan](#) states “Foremost in consideration should be the extent to which the [De Anza Cove area] SSA can contribute to the Park’s water quality” (pg 53) and includes Appendix 1 (Philip Williams and Associates Ltd.) and 2 (Richard Gersberg PhD, SDSU) that clearly show the Master Plan’s focus on wetland restoration and the substantial results shown almost 30 years ago of the power of restored wetlands for water quality improvement. Therefore, the EIR should analyze increased wetland acreage by shrinking the island and removing the channel from Rose Creek to De Anza, moving more of these land uses into the Regional Parkland use. Wetland restoration is coastal dependent and this is the best location for wetland restoration in the entire bay.
3. The spit of upland/buffer land extending to the south on the west side of Rose Creek will block freshwater getting to Kendall Frost—shrink the spit west of Rose Creek and create an island farther south in the bay for high tide use by birds and protection of the marsh from Bay traffic.
4. De Anza Cove should be for non-motorized boats only. The NOP states that the potential boat lease in modified De Anza Cove is for non-motorized boats, but that motorized boats would have access to the cove. This would be unsafe for the non-motorized boat users and swimmers in the cove, and would increase erosion of the beaches and wetland habitats.
5. The EIR should also clarify and expand on how water quality impacts from upland land uses will be dealt with on site, as required by Regional Water Quality Control Board and City regulations. The Water quality fresh water zone in De Anza Natural is promising, but needs to show how those improvements will be delivered to the water in the rest of the bay.

Sea level rise resilience

- **The EIR must show us how sea level rise affects the City plan.**
- **The island with low-cost visitor accommodation land use needs to be smaller and showcase resilient recreation opportunities with no permanent structures and no private motorized vehicle access.**
- **The EIR needs to show how 80 acres of “additional functional wetlands” remain after 2100 sea level rise predictions.**
- **The analysis should show how the City achieves its climate action plan goals through the land use plan.**

- **Identify the long-term needs, frequency and costs of the maintenance of the shorelines, the channel to the recreational cove and the Cove itself, including the resulting mitigation needs and costs.**

This plan has more coastal wetland acreage than present and more than the previous 2018 NOP. The island of upland/buffer area proposed east of Rose Creek, near the eastern boundary of the study area and surrounded by restored wetland could be good as high-tide refugia for birds and other wildlife and includes valuable transitional habitats needed by many species of marsh plants and wildlife. Everyone and everything that relies on this area and these habitats needs the City to plan for the unknown, for the worst-case scenarios of sea level rise, so that we're prepared with resilient habitats. We need our public spaces to be ready for faster changing ocean levels than even what's expected today.

The EIR should analyze these critical components.

1. The EIR needs to clarify many of the climate resilience unknowns in the De Anza Natural Plan. The plan doesn't show how the habitats and land uses change as sea levels rise. The Regional Water Quality Control Board's funding requires wetland restoration be based on "Year 2100... sea level rise projections" ([Mission Bay SEP](#)). This is a critical metric of success for the plan. The public can't fully comment on the resilience of the marsh and our park in this plan without understanding how sea level rise changes the habitats and shoreline. Show us how sea level rise affects the plan over time.
2. Analyze a smaller island with camping land uses that showcase resilient recreation opportunities with no permanent structures and no motorized vehicle access. It should change over time as sea level rise reclaims this area in the coming century. We note that the De Anza Plan shows multi-use trails entering this island, and the EIR needs to maintain that access, identified in the [City Pedestrian Master Plan](#) as walking and paved paths not adjacent to roads (page 63) and matching what the public knows now from the Mission Bay path that rings the Park and meanders the coastline.
3. The City needs to show how 80 acres of "additional functional wetlands" remain after 2100 sea level rise predictions, as required by the Regional Water Quality Control Board funding ([Mission Bay SEP](#)). The EIR should show how the land uses change over time, so that the wetland habitat remains wildlife habitat through time. The carbon storage and sequestration values of the restoration changes as sea levels rise and the EIR should clarify that.
4. The wetland acreage should be increased to help the City achieve its climate resiliency goals. The City is missing its greenhouse gas reduction targets set in the 2016 Climate Action Plan, and the City's own [Vulnerability Assessment](#) (pg 40) shows that "43% of our salt marsh acres may be inundated under 0.25m (1ft) of sea level rise." More tidal

wetlands mean more carbon sequestration to help the City meet its Climate Action Plan goals and decreased emissions from land uses that are moved further into the park. The emissions released from the creation of the plan, which might include trucking or barging soil off-site, should be quantified and compared to the other alternatives and to the sequestration accomplished by the marsh over time.

5. The maintenance needs for the City plan are also a critical component that should be analyzed. The plan doesn't show which shorelines are hard or soft and what maintenance is required to keep the shoreline where it's planned. The channel from Rose Creek to De Anza and the plan for the crossings of the channel are important, and perhaps expensive, missing pieces. The EIR must analyze the long-term maintenance needs for the hard shorelines and channel to De Anza Cove and their costs to construct and maintain them.

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- **Conduct a Traditional Cultural Properties review and identify Tribal Cultural Resources in the EIR.**
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- **The EIR should also include a plan to permit outdoor education programs in Mission Bay.**
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- **The EIR must show public tidelands and analyze the plan's ability to deliver on the goals of tidelands management.**
- **Options for renaming features in the park should be discussed and analyzed in the EIR.**

The De Anza Natural NOP states: "De Anza Natural will also recognize 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.” We fully support this statement and stand ready to help the City embark on serious collaboration. The City’s [Parks Master Plan](#) is a guidepost for the City’s actions to reconnect Kumeyaay communities to our Regional Parks, with policies AC6, AC7, AC8 and AC9 specifically identifying engagement, names, plants, and “the cultural connection to the land” as goals of our public places (pg 98). The plan buffers much of the wetland with Upland/Buffer areas which will improve the value of the habitats, but noise, water quality, and other disturbances associated with pavement and RVs are more problematic than tent camping and other low-impact land uses. And we feel that the plan improves, but can do much better, in re-balancing Bay-wide recreational opportunities provided.

To improve access opportunities, the EIR should look at these issues.

1. The [City plans for recreation at the Bay-wide scale](#), and this EIR needs to analyze the changes in beach and boat access compared to those opportunities in the entire Bay, and compare the addition of accessible nature-based tidal-wetland and cultural center access compared to those opportunities in the rest of the Bay.
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5. The EIR also needs to define low-cost visitor accommodation. The ReWild Coalition wants equitable access opportunities and programs with low-cost guest accommodation accessible to all San Diegans, including disadvantaged communities and Native American groups. The EIR needs to show an analysis of how they will reach their target demographic of low-cost visitors.
6. The City of San Diego needs to develop a comprehensive permitting process to support nonprofit outdoor recreation and education programs that promote equitable and environmentally responsible coastal access to Mission Bay for youth and families who face significant barriers, including those from Native communities. Currently, no such permitting process exists.
7. The low-cost visitor accommodation should have an education focus, to improve the management of the area and better set expectations for acceptable disturbance levels from this land use.
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Habitat Restoration

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- **Increase the amount of transition zone habitat for Belding's Savannah Sparrow and other species.**
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- **Uplands and Buffers land use should be planted with only native species, should focus on education and passive enjoyment, and not include roads for motorized vehicles or parking.**



Just as Kendall-Frost Marsh is the last remnant of this once-common habitat in Mission Bay, a small population of the endangered Ridgway's Rail have survived in the Marsh for decades, with a low of 2 rails found in the 2019 survey (report to the USFWS and CDFW, 2021). As is the story in many coastal marshes, their populations are greatly reduced throughout Southern California. They are federally endangered and covered in the City of San Diego's [Multiple Species Conservation Plan](#) (pg. 47). The value of the habitat for Ridgway's Rail should be analyzed in the EIR.

To improve the habitat provided by the City, the central City in this most-biodiverse County in the country, the EIR must look include these habitat restoration issues.

1. The federally-endangered Light-footed Ridgway's Rail persists in Kendall-Frost Marsh. They are covered in the City of San Diego's [Multiple Species Conservation Plan](#) (pg. 47), where "active management of wetlands to ensure a healthy tidal saltmarsh environment and measures to protect against detrimental edge effects" are required. Tidal wetland restoration, with ample freshwater input for cordgrass survival and high-tide refuges protected from the developed edge of the marsh, are needed for these species. The value of the habitat for Ridgway's Rail should be analyzed in the EIR, and the spit of Upland and Buffer land east of Rose Creek should be changed to allow more freshwater flow to the existing marsh.
2. The [Mission Bay SEP](#) states that the new alternative will "increase the acres of wetland and associated transitional zones and uplands" and these habitats are critical habitat for the endangered Belding's savannah sparrow and many other species. Transition zone habitats have been almost completely eradicated and replaced with beach or rip-rap in Mission Bay, and restoring this habitat should be prioritized. The EIR should quantify the change in this habitat type.
3. Mudflat, low marsh, high marsh, transitional zone and upland habitat should be shown in the EIR in the years 2050, 2075 and 2100.
4. The Upland and Buffer land uses will be a valuable component of the coastal habitat complex, but the Upland and Buffer land uses should be clearly defined and should augment the habitat, education, and connection value of the restored wetland. The EIR must define these land uses and must show how marsh migration as sea levels rise is facilitated.

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.

Fostering the protection and appreciation



of birds, other wildlife, and their habitats...

Sincerely,

James A. Peugh
Chair, Conservation Committee
San Diego Audubon Society

Travis Kemnitz
Executive Director
San Diego Audubon Society

From: [Jim Royle](#)
To: [PLN PlanningCEQA](#)
Subject: [EXTERNAL] De Anza Natural NOP
Date: Thursday, February 10, 2022 9:41:22 AM
Attachments: [De Anza Natural NOP.pdf](#)

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Attached is a scan of the SDCAS comment letter on the De Anza Natural NOP. A hard copy is also being mailed.

Jim Royle



San Diego County Archaeological Society, Inc.

Environmental Review Committee

10 February 2022

To: Mr. Jordan Moore
Planning Department
City of San Diego
9485 Aero Drive, MS 413
San Diego, California 92123

Subject: Notice of Preparation of a Draft Program Environmental Impact Report
De Anza Natural

Dear Mr. Moore:

Thank you for the Notice of Preparation for the subject project, received by this Society last month.

We are pleased to note the inclusion of historical resources in the list of subject areas to be addressed in the DEIR and look forward to reviewing it during the upcoming public comment period. To that end, please include us in notification of the public review of the DEIR and ensure availability of a copy of the cultural resources technical report(s).

If not already consulted, we suggest including review of the 1928-29 aerial photographs for the project area from the County's Department of Public Works Cartographic Services in Kearney Mesa. As far as we know, these are the oldest aerial photos of most of the county.

SDCAS appreciates being included in the City's environmental review process for this project.

Sincerely,

A handwritten signature in black ink, appearing to read "James W. Royle, Jr.", is written over the typed name.

James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: SDCAS President
File

From: [1st Vice Commodore Brian](#)
To: [PLN_PlanningCEQA](#)
Subject: [EXTERNAL] Fwd: De Anza Natural - comments
Date: Thursday, February 10, 2022 1:43:00 PM
Attachments: [Letter to Mayor and City Planning - De Anza Natural.docx](#)

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----- Forwarded message -----

From: **1st Vice Commodore Brian** <1stvicecommodore@sdmbbbsc.org>
Date: Thu, Feb 10, 2022, 1:09 PM
Subject: De Anza Natural - comments
To: <CEQA@sandiego.gov>, Entire SDMBBSC Board <board@sdmbbbsc.org>, <MayorToddGloria@sandiego.gov>

Mayor Gloria & SD City Planning Dept,
On behalf of the Board of Directors and the 300+ local member families of the San Diego Mission Bay Boat & Ski Club, please find attached our formal comments to the draft plan for De Anza Natural.

Thank you for your consideration.
Sincerely
Brian Niznik
1st Vice Commodore - SDMBBSC

Dear Mayor Gloria & San Diego City Planning Department,

We are writing to you on behalf of the San Diego Mission Bay Boat & Ski Club, a 300+ local family-member non-profit organization that promotes Mission Bay as an active recreational center for all to enjoy. While we commend the City's efforts in moving forward with plans to improve De Anza Cove, we are extremely disheartened to see the San Diego Mission Bay Boat & Ski Club *removed from the Plan* for De Anza Natural as evidenced by the proposed land use map in the NOP and Draft EIR. We urge the *inclusion* of the San Diego Mission Bay Boat & Ski Club in the City's plans as planning efforts such as the EIR move forward.

The San Diego Mission Bay Boat & Ski 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. Our Club takes up only a small footprint in the greater De Anza Cove area 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 our 300+ member-families 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.

Our 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
- San Diego Lifeguards
- Southern California Outrigger Racing Association
- San Diego's Pacific Islander community
- Ikuna Koa Outrigger Paddling Club
- Kai Elua Outrigger Paddling Club
- San Diego State's Concrete Canoe Team
- San Diego Audubon Society and the Kumeyaay tule boat program
- Friends of Rose Creek
- Pacific Beach Town Council
- Dana Landing
- San Diego Associations of Yacht Clubs
- 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)

With these partnerships and others, we are expanding the opportunities for our regional cultural and educational programs. We aim 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.

We 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 our current location in a way that will allow us to remain in our current location, be a vital part of the De Anza Natural plan and allow us to continue to serve the San Diego community and foster new experiences in Mission Bay.

Sincerely,
Board of Directors – San Diego Mission Bay Boat & Ski Club

From: [Linda Giannelli Pratt](#)
To: [PLN PlanningCEQA](#); [Sandel, Scott](#)
Subject: [EXTERNAL] Public Comment- De Anza Cove Amendment to the Mission Bay Park Master Plan for De Anza Cove
Date: Thursday, February 10, 2022 4:50:49 PM
Attachments: [2022 February Ltr De Anza Wetlands.pdf](#)

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To Whom It May Concern;

The overarching mission of Stay Cool for Grandkids is to promote climate-friendly decisions in San Diego. We have a keen interest the De Anza Cove amendment because not only is it an opportunity to sequester carbon and mitigate climate impacts, but it is a gem of Mission Bay that should be protected for our grandchildren.

Please find the attached public comment. We appreciate your consideration of the "reWild- Wildest" option.

You are welcome to contact me if you have any questions.

Kind regards,
Linda

Linda Giannelli Pratt

"Not what we say about our blessings, but how we use them, is the true measure of our thanksgiving."

[Stay Cool for Grandkids-](#) Because our legacy matters!



February 10, 2022

City of San Diego Planning Department
9485 Aero Drive
San Diego, CA 92123
Attn: Jordan Moore, Senior Planner
by email to PlanningCEQA@sandiego.gov

Subject: De Anza Natural (Amendment to the Mission Bay Park Master Plan)

STAY COOL for Grandkids appreciates the opportunity to provide comments on the “De Anza Natural” plan for the north shore of Mission Bay. Inspired by love for our grandchildren and alarmed by the threat of climate change, *STAY COOL* was established as a nonprofit organization by San Diego elders who seek to mend our generation’s legacy and protect our grandchildren's climate future.

As advocates for policies and actions to mitigate climate change and to adapt locally for its effects, we see this Mission Bay plan amendment as a timely opportunity for the City to take actions that address these challenges. We appreciate the planners’ responsiveness thus far in envisioning a more natural future for the De Anza area.

We urge you to consider these guiding principles as you plan for the future of the De Anza area:

1. Restoration of natural systems should be the predominant goal

It is already known that the Kendall-Frost Marsh is a valuable contributor to carbon sequestration and storage. Therefore, protecting these wetlands into the future is vital. Coastal wetlands also absorb energy from storm surges, clear pollutants from water, and provide critical wildlife habitat. These services will only become more valuable as climate change brings us changes in precipitation, extreme heat events, and sea-level rise, and critical habitat is lost to droughts and floods. For these reasons we urge that restoration of natural systems be the predominant goal in developing this plan amendment for Mission Bay.

2. Fully evaluate the ReWild Coalition’s “Wildest” alternative

With this in mind, the highest priority should be expansion and restoration of the wetlands. Please fully evaluate the ReWild Coalition’s “Wildest” alternative. It is also critical that wetlands expansion include planning for areas where different types of habitat can migrate as sea level rises. That is, we’ll need areas where eelgrass can spread as lower areas are drowned, sites for mudflats as high tide moves ever higher,

sheltered and safe areas for birds seeking nesting sites, and the cleanest possible water for nurseries.

3. No new upland development built out into the Bay

The current De Anza Natural proposal shows an island for “low-cost accommodations” jutting into the Bay. It separates areas of wetland, introduces a channel that would have to be bridged to provide people access, and creates a shoreline that would need constant structural maintenance. Not only would this be a big investment in a short-lived amenity, but it would also limit opportunities for wetlands to adapt naturally to changing conditions. We urge no extension of upland development into the Bay.

4. Pull back the peninsula at the former Campland site

Similarly, an uplands peninsula shown at the former Campland site should be pulled back, allowing a wide-as-possible delta for Rose Creek for more nature-directed mixing of fresh and salt water. This will allow floods to have more room to slow and be absorbed into the wetlands, more water can be held when inflow is low, and it will also allow for a rising shoreline.

5. Favor low-impact recreation

Finally, we would like the Plan to favor low-impact recreation. Mission Bay offers a wealth of recreational opportunities including motorized sports and acreage for picnicking, dogs, ballgames and beach play. These are all valuable, and we recognize that there are many competing recreational interests for the De Anza area as well. But growing in relative importance as we’ve lost access to undeveloped lands are recreational opportunities that reconnect us to our natural world. Walking, paddling, and peddling are valuable too, as are interpretive signs and classes, field trips, birding, and day camps.

In conclusion, De Anza revitalization presents the City of San Diego with a unique opportunity for land-use planning that addresses local and regional climate-action goals, contributes to a healthier Bay, and creates a natural treasure for future San Diegans.

Sincerely,

Linda Giannelli Pratt
STAY COOL for Grandkids Advisory Council Chair

From: [steve lamprides](#)
To: [PLN_PlanningCEQA](#)
Cc: [Moore, Jordan](#)
Subject: [EXTERNAL] De Anza Natural--Comments for inclusion in the comments to NOP
Date: Thursday, February 10, 2022 6:34:36 PM

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Persons:

I write on behalf of the residents of the Webster Community, recently we have been designated as an underserved community, now we are considered as a community adjacent to an underserved community, we are proud.

Upon review of the project description we note that Mass Transportation, which may be indicated as transportation in the recommendation, is not described as are other forms of transportation. We also note that an existing, historical boat and ski club is not mentioned in the project description. What assurance do we have that all of the activities which can be imagined for a regional, public water body will be included in the program environmental impact report for the subject?

Regards,

Stephen Lamprides, President
Webster Community Council c/o

Stephen Lamprides
4856 Fir Street
San Diego CA 92102
619-981-1398