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Via Electronic Mail

April 20, 2023

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

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

Re: Comments on Mission Bay Park Master Plan – De Anza Amendment and Draft PEIR

Dear Mr. Sandel and Ms. Moore:

Thank you for the opportunity to comment upon the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (“**Master Plan Amendment**”) and associated Draft Program Environmental Impact Report (“**PEIR**”). Our clients, Northeast MB, LLC and Campland, LLC, and their affiliated management company, have decades of experience managing RV campgrounds, marinas and other waterfront recreation facilities. We write in support of the Master Plan Amendment and believe it strikes an appropriate balance between environmental stewardship of important coastal natural habitats while fostering public access and affordable accommodations for all San Diegans. Please consider the following comments:

1. The Site Plan at Figure 3-1 of the PEIR illustrates proposed land uses. A total of 48.5 acres is allocated to “Low-Cost Visitor Accommodations,” a significant portion of which is situated on the southern side of the project area, separated from the balance of the Low-Cost Visitor Accommodations designation by water (in effect, an island). The Site Plan indicates two Multi-Use Paths connecting the island to the mainland. The Site Plan also designates several Vehicular Access Points. Please confirm that the Master Plan Amendment and PEIR contemplate vehicular access to all areas designated as Low-Cost Visitor Accommodations.

2. If the PEIR does not accommodate vehicular access, in our experience, the lack of direct vehicular access to campsites and other low costs accommodations creates a myriad of issues, such as an inability to provide vehicular access for maintenance, repair, rescue, and other crucial public and guest serving functions. It would also prevent any kind of RV use which would profoundly diminish accommodations types and public access. We therefore strongly urge that the Master Plan Amendment and PEIR clarify that vehicular access is contemplated to all areas designated Low-Cost Visitor Accommodations.

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3. The Hydrology and Water Quality Technical Memorandum included as Appendix I to the PEIR states at page 2, “A new channel connecting Rose Creek to the De Anza Cove water area would be constructed at approximately Lilac Drive, creating a new island that would be accessed by two new bridges.” We suggest that the statement be modified to say, “A new channel connecting Rose Creek to the De Anza Cove water area could be constructed...” We could not find a similar reference to new bridges in the Master Plan Amendment or PEIR. We suggest a clarification of the language to say, “A new channel connecting Rose Creek to the De Anza Cove water area could be constructed...”

4. If bridges are found to be required, please confirm whether such bridges are intended as a means of connecting the island to the mainland for the purpose of allowing water to flow unobstructed from Rose Creek to promote newly created wetlands within and adjacent to De Anza Cove.

5. There is no study provided that evaluates the efficacy of providing Rose Creek water flow directly into the De Anza Cove area. Rose Creek often delivers contaminants into Mission Bay. Those contaminants can adversely affect the swimming beaches contemplated and may negatively impact the wetlands contemplated to the east. Additionally, Rose Creek delivers large quantities of silt into Mission Bay. If this connection is considered, there should be an analysis of the impact the silt will have on this connection and the potential need for ongoing maintenance and clearing of the channel.

6. The San Diego Regional Water Quality Control Board requests a hydrologic model of the proposed new channel, but the PEIR does not include one. We agree that such analysis is needed. An alternative to providing Rose Creek water to the contemplated wetland east of De Anza Cove could be provided via a culvert along Grand Avenue or an underground culvert in the proposed location of the channel. If directing Rose Creek water to the eastern wetlands area is desirable, these should be evaluated as alternatives.

7. Bridges are very expensive and would render the planned future coastal accommodations less affordable and less accessible to the public. We suggest that the Master Plan Amendment and PEIR expressly allow the use of more cost-effective approaches addressed above. If it is found that directing Rose Creek water to De Anza Cove is desirable, the alternative strategies would dramatically improve pedestrian and vehicular mobility to and from the land to the south while allowing channel water to flow to the desired locations. It would also provide for more camping and improved rental income for the City of San Diego.

8. The proposed Master Plan Amendment will result in a net decrease in recreational opportunities and affordable visitor accommodations within the coastal zone. The alternatives studied in the PEIR are more extreme in this regard. Will the public go elsewhere seeking recreational opportunities and potentially overburden other existing coastal resources? Or might the Master Plan Amendment simply result in fewer people having access to coastal resources? Neither

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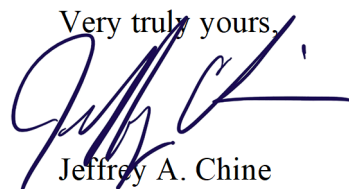
the Master Plan Amendment nor the PEIR acknowledges this fact. The PEIR fails to analyze the potential impacts of these reduced opportunities for the public and whether inhibiting public access to such coastal resources is consistent with applicable policies.

9. CEQA Guideline section 15382 provides, “An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.” The PEIR must analyze whether the reduction in recreational opportunities and low-cost visitor accommodations results in an environmental impact.

10. An increase in wetlands for bird habitat, reflected in the proposed project, and more dramatically in project alternatives, necessarily will result in an increase in the waterfowl population and, consequently, an increase in waterfowl excrement. Scientific literature and recent studies of Mission Bay demonstrate that waterfowl droppings have an adverse effect on water quality. The PEIR does not study this potential environmental effect of the proposed project or the alternatives and how adverse effects on water quality will impact wildlife and people using the bay, including swimmers and others coming into direct contact with bay water.

11. Carbon sequestration as a means to combat climate change is one of the main reasons cited by those who favor the creation of more wetlands at De Anza at the expense of recreational and low-cost visitor accommodations. Addressing climate change is a laudable goal, to be sure. However, in this instance, greater wetland creation comes at the cost of reducing public access to scarce coastal resources – particularly those who can’t afford more expensive coastal destinations. There are much more cost-effective ways to sequester carbon than the creation of wetlands, particularly in Mission Bay Park. Additionally, the activities necessary to create wetlands will itself release carbon sequestered in the ground and underwater. These tradeoffs and the value of carbon credits compared to the wetland creation and ongoing maintenance costs are not acknowledged or considered in the PEIR or the Master Plan Amendment. There are undoubtedly more efficient ways to sequester carbon in other parts of San Diego. These alternatives have not been evaluated in the PEIR.

We appreciate the ability to comment on these important issues and look forward to your responses.

Very truly yours,

Jeffrey A. Chine

JAC:sn

cc: Michael D. Gelfand
Jacob Gelfand

March 22, 2023

Yes! De Anza Peninsula is a jewel for San Diego. Let's not squander its unique attraction for the dubious value of adding a small amount of marshland to an existing already large marsh.

Jacob Gelfand's Campland organization is proven to be the **right group** to do the necessary transformation to start De Anza on the path to recovery and success. Campland's **proven 50-year history** shows how they have been **good stewards** of this precious resource.

Campland is now cleaning up De Anza, which will transform an unusable eye-sore into **affordable waterfront access** enjoyed by many.

San Diego is lucky to have De Anza and the Campland organization. They are **magnets** for campers who bring revenue and jobs to the City.

With the new project to clean up a long-blighted area, San Diego will again benefit from this **good neighbor**.

"Mission Bay Park Master Plan supports that this Regional Park serves all of the residents of San Diego as well as visitors". And further states "land use recommendations include regional recreation needs, including Guest Housing (camping facilities and recreational vehicles)".

"Leaseholds that support the Mission Bay recreation use" are already in place with Campland and Mission Bay RV Resort.

Keep them BOTH. It's a no-brainer, good business, win-win decision.

Barry Homer

**JEFF A. GREENWALD
13600 VIA SERENA
POWAY, CA 92064
(619-972-7554)**

April 09, 2023

ssandel@saniego.gov

JoeLaCava@saniego.gov

San Diego Planning Commission

**RE: LETTER OF SUPPORT FOR PACIFIC BEACH TENNIS CLUB / LETTER OF OPPOSITION TO
PROPOSED MODIFICATIONS OF PACIFIC BEACH TENNIS CLUB FACILITY**

Mr. LaCava, Mr. Sandel and the San Diego Planning Commission:

My name is Jeff Greenwald. I am a member of both the Rancho Penasquitos Tennis Center and San Diego Tennis & Racquet Club, and I serve on the Executive Committee of the San Diego District Tennis Association (USTA). I personally Chaired the 2013 expansion of the Rancho Penasquitos Tennis Center ("RPTC) from 10 courts to 12 courts, and I am currently on the Implementation Committee for the 2023-2026 further expansion of RPTC that will add four to five more courts, a clubhouse and other facilities to the existing facility to meet the needs of our local community, where RPTC's membership waiting list now exceeds three years.

I am aware of the De Anza Cove / De Anza Natural Plan proposal that would require 100-foot setbacks for all improvements from Rose Creek. This plan, as strictly proposed, would appear to have a significant negative effect on the current existence of at least two tennis courts at the Pacific Beach Tennis Club. While the community understands that this plan does not specifically call for the closure of the PB Tennis Club at this time, the loss of two or more tennis courts would create a significant hardship on the facility, its membership and the community.

The Pacific Beach Tennis Club is considered a significant asset to not only the Pacific Beach community, but to the overall San Diego Tennis Community. One significant impact of the loss of two courts would be the fact that the club would be unable to continue to host its annual, sanctioned PB Open tennis tournament. Another example would be the fact that given SUP requirements for public access, the membership would have to be significantly reduced, thereby placing the operation in financial ruin. A last example would be the Club's loss of access to USTA league tennis.

I urge you to find a way to meet the needs to the De Anza Natural Plan in such a way that it does not destroy the functionality and financial stability of the Pacific Beach Tennis Club, which has been an asset in the community for 60 years.

Regards,

Jeff A. Greenwald

Thank You for your consideration. I represent the Convair Waterski Club, which has been a regular user of Mission Bay Park since the club's origin 65 years ago. Over that time period, 1000's of San Diego residents and guests have participated in our club activities....most notably, Rachel Welch and several NASA astronauts.

Our club has taught hundreds of adults and children how to ski and operate boats safely through our training programs. We also regularly provide opportunities for active duty military between their deployments.

Over 25 years ago, General Dynamics closed the Kearny Mesa facility and we moved our boats to the SDMBB&S Club. We have been active members of that club since the move and regularly support their charitable work such as Blind Ski events.

Our club's future is tied the Boat Club's future, as there are currently no other facilities in or near Mission Bay Park that meet our needs.

Over the past several years, we have regularly attended meetings and provided public comment to the evolving plans of the De Anza Natural Project; so far, the plan has yet to include a viable option for the Boat Club.

Simply put, we request that the planning department re-visit their current plan to evaluate the best way to maintain the Boat Club's presence in Mission Bay Park, so that the Convair Waterski Club can prosper for another 65 years.

I see two options for your consideration:

- 1) Allow the boat club to keep its current location, with Rose Creek shoreline/boundary modifications to allow for native plants.
- 2) Add back into the Mission Bay Park Master Plan the 4 acres near South Shores ramp that has long been previously designated in the plan as reserved for the boat club.

There are currently no other clubs in San Diego similar to Convair Waterski club, operating as a non-profit and open to the public, that offers residents and guests the on-water activities in Mission Bay Park that we do.

Steve Trudgen

President, Convair Waterski Club

Share your thoughts on the future of Mission Bay Golf Course!



Recently, The City of San Diego of San Diego's Planning Department released the draft of a project called "De Anza Natural," which could make some significant changes to the northeast corner of Mission Bay Park.

As someone who enjoys playing our San Diego City golf courses, we wanted to make sure you were aware of this proposal and had the opportunity to share your [feedback](#).

The project draft would be an amendment to the Mission Bay Park Master Plan and envisions a balance of land uses that serve local and regional recreational needs, provides access to low-cost coastal visitor accommodations, like campsites, and restores natural habitats to prepare for the impacts of climate change. Read more [here](#).

The Mission Bay Golf Course is situated in the project area and depending on which elements are ultimately decided upon, the golf course could remain the same, it could be altered or shortened, or it could be eliminated. Other recreational uses currently in the area, such as ball fields and courts, are also being discussed as part of the plan.

Again, we want to make sure that all who enjoy Mission Bay Park and our Mission Bay Golf Course are given the opportunity to share their feedback on the future of the park and be a part of the process. Click [here](#) to learn more and share your feedback.

DE ANZA NATURAL. 4 ALTERNATIVES. SEPT. 13, 2022				
Joanna Hirst	San Diego City Planners			
	<u>3.1</u>	<u>3.2</u>	<u>3.3</u>	<u>3.4</u>
Active Recreation	60.5	52.6	49.9	50
Regional Park	26	40	32.3	30.8
Open Beach	5.5	4.4	3.4	2.3
Low-cost visitors	48.5	40	45.3	27.4
Boating Facility	2.6	2.3	3	3
Interp.Nature Ctr.				
Uplands	37.5	29.1	38.8	46.1
Wetlands	219.4	235.4	228.2	243
Potential				
water lease	2.1	0.7	1.7	1.7



Southwest Wetlands Interpretive Association
PO Box 575
Imperial Beach, CA 91933

20 April 2023

Scott Sandel
City of San Diego Planning Department
9485 Aero Dr
San Diego, CA 92123

(submitted 20 April 2023 via email to ssandel@saniego.gov)

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

Dear City of San Diego/Mr. Sandel:

The Southwest Wetlands Interpretive Association (SWIA) is a non-profit organization dedicated to helping preserve and enhance wetlands throughout southern California – and particularly in the Tijuana River watershed and South San Diego Bay. Historical losses of over 95% of Mission Bay wetlands have occurred from development, and climate change and sea level rise represent significant additional threats to natural resources and infrastructure/developments in Mission Bay. SWIA supports planning that will implement wetlands restoration/creation that is sustainable and enhances these public trust tidelands and water of De Anza Cover and nearby portions of Mission Bay.

We have reviewed the PEIR and provide the following comments, many of which were included in the ReWild Coalition letter that San Diego Audubon Society has submitted. As described below, we believe the PEIR is inadequate and needs to be revised to provide more accurate analyses, and new findings regarding the most appropriate project for the area.

General Comments

The project objectives are too vague to be effective for evaluating alternatives. And importantly, fail to adequately prioritize water quality improvements in Mission Bay as required by the 1994 Mission Bay Park Master Plan. Add a specific project objective to "improve the water quality of the study area and the bay through natural, resilient infrastructure."

The draft PEIR is missing details on foreseeable impacts from sea level rise that must be part of the analysis for determining the best land-use plan.

The city's Climate Action Plan calls for 700 acres of restored tidal marsh by 2035. The ReWild “Wildest” plan provides the city with one of the best ways to achieve this goal, but the draft PEIR for the De Anza Natural plan inaccurately dismisses the ReWild proposal by summarily concluding it fails to meet project objectives.

The city's proposal fails to analyze the recreational and cultural opportunities of connecting Mission Bay Park to a restored tidal ecosystem. Doing so would better balance and expand the park's recreational offerings. All San Diegans, including our Kumeyaay neighbors and those in underserved communities, will benefit with access to a vibrant tidal marsh.

Specific Comments

Page S-2. Project Objectives. These “objectives” are written as general project goals rather than project objectives. They are too vague to be used for the purpose of effectively developing the proposed project and evaluating the potential alternatives to the proposed project. The objectives should provide clear, more specific components for each objective. The objectives must also reflect and include relevant requirements and commitments for this portion of Mission Bay Regional Park, such as providing “A large saltwater marsh that enlarges the Northern Wildlife Reserve is proposed west of Rose Creek adjacent to the existing Northern Wildlife Preserve, and along Rose Creek and where the creek merges with Mission Bay.” (as specified in the March 2023 Draft De Anza Cove Natural Amendment). Similarly, the City has committed, pursuant to its RWQCB grant funding (R9-2020-0150 SEP), to create an “expanded wetland alternative [that] would maximize implementable wetland restoration reflective of existing feasibility studies for Mission Bay...” Each of the objectives must be rewritten to provide at least that level of clarity and specificity.

Page S-7. Environmentally Superior Alternative. The PEIR states that the “No Project/No Build Alternative” is the environmentally superior alternative because it “would avoid ground disturbance that could result in impacts to subsurface archaeological resources or Tribal Cultural Resources (TCRs), and would reduce the project’s significant and unavoidable impacts on historical, archaeological, and TCRs.” However, the PEIR also states that this alternative would not meet all of the project objectives, and in Chapter 8 that analyzes the alternative, it identifies numerous area for which impacts would be greater than the proposed project – and other alternatives. [As we stated above, those must be more clear, specific, and address environmental, recreational and all other relevant commitments for the project area.]. Therefore, it cannot be the superior alternative if it would not meet the essential commitments that the City has made and has similar or more impacts than the other alternatives. See our comments on the alternatives section.

Page S-9, et seq. (Table S-4).

- Under Land Use (MSCP), the impact analysis is stated: “Impacts would be potentially significant.” but then no mitigation measures are identified and the impact level after mitigation

is “Less than Significant.” If the results of the impact analysis in the Land Use section of the PEIR found no significant impacts, then this summary text needs to be corrected.

- Under Biological Resources (Page S-19), the text states “Would the proposed project interfere substantially with the movement of any native resident or migratory fish or wildlife species...” and found that it would not and proposed no mitigation. Because the project and most alternatives would affect a portion of lower Rose Creek, which supports native species, it would appear that potentially significant impacts could result, which would necessitate mitigation measures. MM BIO 5.3-2 through MM BIO 5.3-5 would appear to reduce those potential impacts to less than significant, and the text should be reflect the potential impacts and the application of those mitigation measures.
- The Greenhouse Gas Emission section found no potential impacts because the proposed project would conform to City, regional and state climate plans. However, the proposed project, and any similar project, will eventually involve construction and significant earthmoving, dredging, and filling that will have at least temporary elevated GHG emissions. How or whether conformance to those plans would result in no significant project impacts (even if construction period-related only) cannot be assured. This region has not demonstrated that emissions will be reduced to meet current state GHG reduction targets. Absent more project information and mitigation measures it is not defensible to state that the project may have no significant emissions. It seems that a more appropriate finding would be that approval of the proposed project (or similar alternative) has a potentially significant impact to GHG emissions, but that that conforming to those plans – and perhaps additional specific emission reduction measures developed when the project-level EIR analysis is produced, is expected to reduce those to less than significant. That approach would be comparable to the Biological Resources section analysis in that, while approving the PEIR will not itself have biological impacts (it is only a plan), the PEIR correctly identified numerous potential biological impacts from subsequently implementing a specific project, such that the PEIR is required to make a “significant impact” finding and identify mitigation measures.
- The Hydrology and Water Quality section acknowledges potential water quality impacts and states: “Implementation of the project could result in pollutants generated during construction and operation. Pollutants generated during construction would be temporary and be addressed through preparation of a project-specific Stormwater Pollution Prevention Plan and implementation of construction BMPs.” It is not assured that BMPs alone would prevent water quality impacts and the PEIR should identify that potential and include a set of general water quality mitigation measures, similar to what has been done for potential impacts to biological resources. Improved water quality must be an essential component of the project, but that has not been appropriately addressed by the project nor analyzed by the PEIR.

Page 3.2 et seq (Project Description). We disagree that the Proposed Project is appropriate and best meets the project objectives – which as we stated in our comments above need to be more clear, specific, and include commitments that the City has made regarding the De Anza Cove area. Of

particular concern is the proposed (low cost accommodations) development on the “boot” area south of the identified new channel. That would reduce the potential to meet the expanded saltmarsh/wetlands commitments and also would introduce many impacts (noise, lighting, general human activities) to the adjacent wetlands.

And, as noted previously, we believe that the list of project objectives is inadequate to be used to develop and evaluate a proposed project and alternatives. Nowhere in the PEIR is there a substantive elucidation of what those vague project objectives (which are in essence just general goals) should involve and they fail to incorporate the City’s existing commitments for both environmental, recreational, and low cost accommodations within the project area. And to reiterate, the project must explicitly include an objective to improve water quality.

Page 8-1 et seq. (Alternatives). As we have stated in preceding comments, the project objectives are insufficient because they are neither sufficiently clear and specific to understand how they are used to develop and evaluate the proposed project and alternatives, nor do they incorporate significant commitments that the City has made regarding wetlands expansion, water quality improvements and even recreational/low cost accommodations. The project objectives should be revised, include more specificity, and a table prepared to demonstrate how – or not – each alternative conforms to them. As a general statement about the final section of each alternative’s assessment (Relationship to Project Objectives), they provide varying if not different kinds of “evidence” (with no specific criteria) to support how the alternative meets or does not meet – in full or partially – the six objectives. The PEIR needs to provide a table that uses consistent, clear and more specific criteria to summarize how the alternatives are determined to meet or not the objectives – modified as we have recommended in preceding comments.

- The ReWild Coalition letter provides details regarding why its alternatives, especially the Wildest option, should be treated as legitimate project alternatives. The draft PEIR must prepare a table comparable to the ones for the proposed project and analyzed alternatives showing acreages for each use to identify the potential acreages that could be allocated to each use that is addressed in the proposed project or alternative projects.
- No Project Alternative. The analysis of this alternative identifies many impacts compared to the proposed project and other alternatives, including but not limited to: “Therefore, under the No Project/No Build Alternative, impacts associated with conflicts with the applicable air quality plan and operational air quality would be greater compared to the proposed project;” “Therefore, the No Project/No Build Alternative would result in greater operational GHG emissions compared to the proposed project;” “Therefore, the No Project/No Build alternative would result in greater hydrology and water quality impacts compared to the proposed project;” etc. Additionally, compared to the proposed project and most alternatives, it would not “...expand habitat areas, resulting in long-term benefits to wetland habitat, species, and the functions and values of the aquatic resources...” Other than avoiding potential impacts to historical, archaeological and tribal cultural resources that the proposed project and other alternatives may cause (and whose mitigation may or may not be avoidable and mitigable at the

project level), this “alternative” does is not justified to be the environmentally superior alternative.

- Wetlands Optimized Alternative. The PEIR states this alternative would be consistent with the SANDAG Regional Plan, enhance access and safety getting to the site and encourage multimodal transportation options, both locally and outside the local area. However, the analysis later identifies that this alternative would have lower or similar GHG emissions while causing higher VMT (because of a reduction in low-cost accommodations and other recreational activities that would then force potential visitors to use other facilities outside the project area). It is unclear how much re-directed travel would actually occur and if much of that driving originated outside the local area, whether it would even be significant.

We do not agree with the PEIR’s conclusions: “However, the Wetlands Optimized Alternative would not meet project objectives 1 and 6 because, compared to the proposed project, it would not as fully provide equitable access or enhance the public access of De Anza Cove. The Wetlands Optimized Alternative would convert the southern portion of the developed De Anza “boot” and the De Anza Cove open water areas to wetlands. This would result in a reduction in low-cost visitor guest accommodations and open beach uses. Furthermore, the Wetlands Optimized Alternative would not fully implement project objective 5, as active and passive recreational uses would be further reduced, therefore also reducing the customer base and opportunities for passive and active recreation, compared to the proposed project.” The project objectives do not identify any specific set of criteria for “equitable access or enhance public access” or what number of low-cost accommodations and level of beach uses or what level of active and passive recreational uses are desired and appropriate. Absent clarity on those project objectives – and as we reiterate on all project objectives – this is not a justified conclusion with adequate supporting documentation.

- Neither the Enhanced Wetlands/Optimized Parkland Alternative nor Resiliency Optimized Alternative appear to meet the (current) project objectives.
- It is unclear how the PEIR can conclude that the Environmentally Superior Alternative is the No Project when, as described above, it has many potentially greater impacts than the proposed project and, from our review and assessment, than the Wetlands Optimized Alternative. In addition, it fails to meet most of the project objectives. The PEIR does not adequately justify that conclusion.

Sincerely,



Mike McCoy
President



Bill Tippetts
Board Member

Cc: SWIA Board



Karin Zirk
4629 Cass Street #188
San Diego CA 92109

April 17, 2023

City of San Diego Planning Department

RE: Proposed Amendment to the Mission Bay Parks Master Plan and De Anza Natural

Thank you for the opportunity to provide comments on the Mission Bay Park Master Plan (MBPMP) Amendment. I have been involved with this project for over a decade either through my service on the Mission Bay Park De Anza Revitalization subcommittee or via my involvement with the Friends of Rose Creek.

First off, releasing a document sans page numbers makes it difficult for people to reference their comments based on sections of the document. I will try my best but I strongly recommend the use of page numbers in documents to help us all communicate more effectively.

Although the San Diego River once flowed into False Bay and created a huge wetlands complex at the southeast corner of what is now Mission Bay Park, Rose Creek is now the largest source of fresh water inflows into Mission Bay and the best location for substantial wetlands restoration. I strongly believe that wetlands restoration is the best use of this area within Mission Bay Park.

As you can see from this map from 1857, the Historic Rose Creek wetlands stretched from Kendall-Frost Marsh in the west almost to what is now Interstate 5. The map below shows Crown Point to the left and the railroad tracks to the east.



The historic Rose Creek salt marsh and wetlands stretched from what is today's Kendall-Frost Marsh almost to the I-5 southbound on ramp on Mission Bay Drive across the northeast corner of Mission Bay and into what are now schools and residential areas.

In the 1950s and 1960s, the City of San Diego destroyed over 4,000 acres of nutrient rich habitat for wildlife, migratory and local birds, as well as fish, and mud creatures that are at the bottom of the food chain negatively impacting our fisheries. I am asking for a tiny portion of that to be restored. Therefore, it is time to focus on wetlands restoration in the northeast corner of Mission Bay to restore a portion of the historic Rose Creek wetlands.

In regards to: EXECUTIVE SUMMARY: Section III tourist attractions.

I take issue with the fact that low-cost visitor accommodations are already being pitched as recreational vehicles. Low-cost visitor accommodations can include yurts, cabins, and tent camping as well as recreational vehicles. Please update this section as follows:

~~• Overnight facilities for recreational vehicles are proposed as a potential use in De Anza Cove as part of the De Anza Cove Natural plan, Figure 14a At this location, recreational vehicle camping would enjoy optimum water access for swimming, birdwatching, observing nature, recreational opportunities and non-motorized watercraft rentals.~~

Overnight low-cost visitor accommodations are proposed as a potential use in De Anza Cove as part of the De Anza Cove Natural plan, Figure 14a At this location, guests of the low-cost visitor accommodations would enjoy water access for birdwatching, observing nature, recreational opportunities and non-motorized watercraft rentals.

As an aside, elsewhere in this plan, it is indicated that the area near the low-cost visitor accommodations may not be suitable for swimming due to poor water quality. See section 26 where “swimming” is crossed out. Also see recommendation 53: Existing Swimming Areas where it states “Suitability for swimming will be monitored.”

Recommendation 26: Relocation of Campland.

The Mission Bay Master Plan and the California Coastal Commission call for low-cost visitor accommodations. This amendment seems to conflate Campland with the low-cost visitor accommodations under Recommendation 25. Please remove references to Campland “relocation” and focus on low-cost visitor accommodations.

There are conflicts in the MBPMP amendment with the Draft PEIR. In the Draft PEIR, a 200-foot buffer along Rose Creek is identified. Yet in the MBPMP amendment, under item 25, it identifies a 100-foot buffer/public use zone. Furthermore, in Figure 8 it identifies a 300-foot public use zone. Again, all references to the buffer along Rose Creek need to be harmonized to avoid confusion in the future. Also, allowable uses within this buffer need to be harmonized as all these references are vague and ambiguous.

The buffer public use zone should preclude hardscape, active recreation, picnic tables and other uses that could potentially cause pollution in Rose Creek or disturbance to birds and other wildlife. The buffer zone should be off-limits to animals, motorized and non-motorized vehicles, and electronic music. This area should be planted with local natives to provide upland habitat adjacent to the lower Rose Creek salt marsh (that is located downstream of Grand Avenue). Please adjust the MBPMP amendment to conform to the Draft PEIR.

In this same section, the bullet point starting with “Active Recreation,” there is unclear language. This bullet point seems to be discussing the northeast corner of Mission Bay Park. However, it references “West Mission Bay Drive,” which is located on the southern end of Mission Bay Park. It is unclear if the amendment is mixing plans for two separate areas of the park or if this should read “North Mission Bay Drive,” which is the access road to the golf course and the San Diego Mission Bay Boat and Ski Club. This paragraph should be clarified.

Also under Item 25: De Anza Natural Development Criteria.

The MBPMP amendment states that “De Anza Natural shall not be developed to the detriment of existing and/or future adjacent habitat areas. Foremost in consideration should be the extent to which the area can contribute to the Park’s water quality.”

However, the Draft PEIR seems to be in conflict with this statement as it is laying out land uses that may preclude development of future adjacent habitat areas due to the lack of modeling done in the Draft PEIR. (See comments from the Friends of Rose Creek on the Draft PEIR.)

I am extremely disappointed to see the emphasis on retaining the De Anza Peninsula. It is subject to extreme erosion without hardened shorelines.

The section called “NATURAL RESOURCE MANAGEMENT PLAN” is wholly inadequate and should reference appropriate sections from the City of San Diego’s Parks Master Plan. Specifically, the following sections should be incorporated:

- a. CSR2: Improve the quality of habitat in City parks through best practices that support native threatened and endangered species and habitats and consider climate change impacts on species habitat range/ location.
- b. CSR6: Incorporate best practices in the design of parks and selection of plant materials to reduce environmental impacts and promote native, drought-tolerant, resilient landscapes. Prohibit planting species on the California Invasive Plant Council’s list of invasive plants for southern California in parks.
- c. CO5: Manage resource and open space parks for their contributions to ameliorate climate change effects.
- d. CO9: Where feasible, allow access to nature and open spaces, in concert with the goals and policies of the Multiple Species Conservation Program and Subarea Plan guidelines.
- e. AC7: Consider using the Kumeyaay language and culturally appropriate images or symbols when naming and renaming recreation facilities, parks, and open space.
- f. AC8: Consider the Kumeyaay historic use of plants and traditional plant names when developing habitat revegetation and restoration plant palettes and interpretive signage along public trails and pathways.
- g. AC9: Consider the Kumeyaay cultural connection to the land and surrounding environment when developing recreational facilities, parks, and open space.

- h. CSR1: Collaborate with agencies that manage public lands, conservation stakeholders, and community advocates to protect sensitive natural and cultural resources, while providing compatible recreational access and outdoor opportunities.
- i. CSR2: Improve the quality of habitat in City parks through best practices that support native threatened and endangered species and habitats and consider climate change impacts on species habitat range/ location.
- j. CSR7: Increase opportunities for people to interact regularly with green spaces, water, and other natural environments – especially in higher density areas.
- k. CSR16: Increase, expand, and manage the network of habitat patches and wildlife corridors for rare, threatened, and endangered species and the vegetation communities that are projected to be impacted by climate change.
- l. CSR 20: Develop new and upgrade existing parks that support environmental development patterns that protect and preserve natural landforms, public and private open space, wildlife linkages, sensitive species, habitats, canyons, and watersheds.
- m. CSR 21: Preserve San Diego’s rich biodiversity and heritage through the protection and restoration of open space and wetlands resources, including coastal waters, canyons, creeks, riparian wetlands, and vernal pools.
- n. CSR 27: Maximize opportunities to restore native habitat and enhance biodiversity in parks and open space lands.
- o. CSR 30: Promote the awareness and value of wetlands, waterways, and restored landscapes in developed parks as well as open spaces.

In regards to item v. Wildlife habitats, please change the wording in the first bullet point by removing “A large saltwater marsh that enlarges the Northern Wildlife Preserve” to “A large saltwater marsh with 80 acres of salt marsh remaining in the year 2100 that enlarges the Northern Wildlife Preserve....” in order meet the agreement with the Regional Water Quality Control Board under the SEP.

In regards to item vii: Access and Circulation.:

This item indicates a raised boardwalk or path should be constructed under Ingraham Street to connect Sail Bay with Crown Point. This path was completed 20 years or more ago.

Under Recommendations: **13. Northern Habitat Area:**

Please add kayaking and standup paddle boarding to the list of proposed active recreation opportunities. These are very popular activities in Mission Bay Park.

One popular definition of “active recreation” is as follows:

Active recreation. is defined as **activities engaged in for the purpose of relaxation, health and wellbeing or enjoyment with the primary activity requiring physical exertion, and the primary focus on human activity.**

As Mission Bay Park is primarily an aquatic park, I find it inconceivable that in all the sections discussing “active recreation,” non-motorized watercraft activities are not included as types of active recreation proposed for the area. In fact, watercraft activities should be prioritized over non-coastal related active recreation. Furthermore, walking is also “active recreation.”

In regards to public park land, please update the MBPMP amendment to indicate that below-market rate long-term storage of recreational vehicles and watercraft is not an appropriate use of public park or tidelands. Our park needs to be actively used and not be a storage facility for aging vehicles as is currently the status quo at Campland-On-the-Bay and the San Diego Mission Bay Boat & Ski club.

The MBPMP amendment fails to delineate between the Northern Wildlife Preserve in Mission Bay Park and the Kendall-Frost Marsh owned and managed by the University of California. All maps and references should clearly delineate the difference.

As we are already into the third decade of the twenty-first century, it is time to start removing names of genocidal Spaniards from our parks. Juan Bautista de Anza was instrumental in Spain’s genocidal policies towards indigenous communities. As such, I do not feel that he represents the values the City of San Diego would like to embody in the current era. My recommendation is to create a public re-naming process to allow all San Diegans to participate in re-naming this corner of Mission Bay Park with a focus on nature-based names or names of people who have positively created a City of all people regardless of religion, race, ethnicity or origins.

For the City of San Diego to move forward with tribal relations, references to the historic connections between different bands of indigenous nations and the original 4,000 acres wetlands complex should be indicated in the Executive Summary (ES) of the MBPMP. Furthermore, the ES should state that the City is committed to partnering with local tribes and incorporate language related to tribal relations from the Parks Master Plan into the MBPMP amendment either explicitly or by reference.

The current MBPMP relies on the concept of “Parks within a Park.”

And I quote:

“This approach, in effect, creates distinctive recreation areas within the Park, or "Parks Within a Park." One of the main features of the "Parks Within a Park" concept is the **consolidation of natural resources** in the northeast quadrant of the Park, partly in Fiesta Island (mostly upland habitats) and partly in the areas west of the Rose Creek outfall (mostly wetland habitat). Such a land use allocation augments the habitat value of both the existing preserves and proposed new habitats, and maximizes their potential function as a setting for passive, nature-oriented recreation”

I recommend the following changes to the above referenced paragraph:

Change “*partly in the areas west of the Rose Creek outfall (mostly wetland habitat).*” To “*focusing on the areas at the mouth of Rose Creek (mostly wetland habitat).*” As the MBPMP

clearly states, the goal is to “create[s] distinctive recreation areas.” Wetlands are a distinctive recreation area within the park.

Just as Sea World does not provide low-cost and/or active recreation opportunities, there is no reason why the northeast corner needs to have all uses within the park concentrated in this area. I urge you to focus on ensuring that uses are balanced within the park as a whole and not just within the northeast corner.

My overarching comment is we need to prioritize water quality and wetlands creation at the mouth of Rose Creek. Even with the maximum proposed foot print of habitat restoration as demonstrated by the ReWild “Wildest” alternative, we will still fall short of restoring the entire wetlands complex that existed for millennia.

Deepest regards,



Karin Zirk

Lover of wetlands and wildlife

April 17, 2023

To Whom It May Concern,

I am writing this letter to vehemently oppose the closing of Pacific Beach Tennis Club. This facility has been enjoyed by tennis players of all ages for 60 years! I joined Pacific Beach Tennis Club in the 90's and have enjoyed playing there for the last 25 years.

Reducing available land for active recreation is not the answer. The tennis club, ball fields, and Mission Bay Golf Course are sporting venues that are enjoyed by sports enthusiasts of all ages. The tennis courts should actually be expanded to accommodate not only tennis players but the growing number of pickleball players that desperately need places to play in San Diego.

If the city decides to move the tennis courts, ball fields and golf course, it should keep the existing recreation areas open until they have actually been replaced. The city of San Diego has been dragging their feet giving PB Tennis Club a permit to build suitable restrooms. Every time plans are submitted the city has shot them down with no new recommendations. Tennis players at PB Tennis Club have been using porta potties on site for the entire 60 years they have been open. That is ridiculous that the tennis players cannot get plans to build restrooms approved by the city in all that time.

Thank you for your consideration,



Mary Alice Hillier

PUBLIC NOTICE AGENDA

SAN DIEGO PARKS AND RECREATION DEPARTMENT & OFFICE OF BOARDS AND COMMISSIONS

MISSION BAY PARK COMMITTEE

April 4, 2023

Meeting to be held at 6:00 p.m.

Paradise Point Resort and Spa

1404 Vacation Road, San Diego, CA 92109
Mission Bay Room

CALL TO ORDER/INTRODUCTIONS

APPROVAL OF MEETING MINUTES – February 7, 2023

REQUEST FOR CONTINUANCES

NON- AGENDA PUBLIC COMMENTS

This portion of the agenda provides an opportunity for members of the public to address the Committee on items of interest within the jurisdiction of the Committee. Comments relating to items on today's agenda are to be taken at the time the item is heard. Time allotted to each speaker is determined by the Chair; however, comments are limited to no more than two (2) minutes **total per subject** regardless of the number of those wishing to speak. Submit requests to speak to the City staff **prior** to the start of the meeting. Pursuant to the Brown Act, no discussion or action, other than a referral, shall be taken by the Committee on any issue brought forth under "Non-Agenda Public Comment."

CHAIRPERSON'S REPORT – Judith Munoz

CITY STAFF REPORTS

- City Council Office (District 2) – Carrie Munson
- City Council Office (District 1) – Carrie Shah
- Fire-Rescue Department (Lifeguards) – Lieutenant Brian Clark
- San Diego Police Department (Northern Division)
- Mission Bay Park District Manager (P&R) – Mike Rodrigues

ACTION ITEMS

Consent (These items are adopted without discussion; they can be moved to Adoption by any Committee Member.

101. none

Adoption (Each Adoption item requires individual action; they can be moved to Consent by action of the Committee.)

201. Verizon Wireless Telecommunication Facility at 1441 Quivira Road

Verizon Wireless proposes to install a fully concealed wireless telecommunication facility on to the roof of the existing building.

Presenter: Mark Phillips, Land Use Consultant, Precept Wireless Consultants

Special Events (Special Events that require road or plaza closures or will potentially impact park and/or institution operation, are brought to the Committee for a formal recommendation. They can be moved to Consent by action of the Committee.

301. Swim, Bike and Run Practice/Race event -presented by Elba Ismailoglu, Triathlon Club San Diego. Request approval to utilize Fiesta Island road, interior and Enchanted Cove for swim, bike run event on Sunday, October 1, 2023 from 7:00 a.m. to 9:00 a.m. Estimated attendance is 100 participants and 50 vehicles. No alcohol, no vendors. Fiesta Island will be closed to all other vehicles during the event, advanced posting required.

STAFF RECOMMENDATION: To approve use of Fiesta Island and swim area until 9:00 a.m. – road must be clear to open by 9:30 a.m. Special Event Traffic Controllers required.

WORKSHOP ITEMS (No actions taken; discussed by the committee and staff)

401. none

INFORMATION ITEMS

501. Draft De Anza Natural Amendment to the Mission Bay Park Master Plan
A Balance of Uses. Presented by Scott Sandel, Park Designer, Planning Department, Park Planning

SUBCOMMITTEE

601. none

COMMITTEE MEMBER REPORTS: Reports are non-debatable.

- **Council District 1** – James Hauser
- **Council District 1** – Ron Anderson, Vice Chair
- **Council District 1** – vacant
- **Council District 2** – Judith Munoz, Chair
- **Council District 2** – Giovanni Ingolia
- **Council District 2** – Josh Coyne
- **Hotel Lessee** – Jim Gross
- **Non-Hotel Lessee** – Darlene Walter
- **At Large Representative** – Jeff Johnson
- **At-Large Representative** – Marshall Anderson
- **At-Large Representative** – Stephanie Smith

ADJOURNMENT

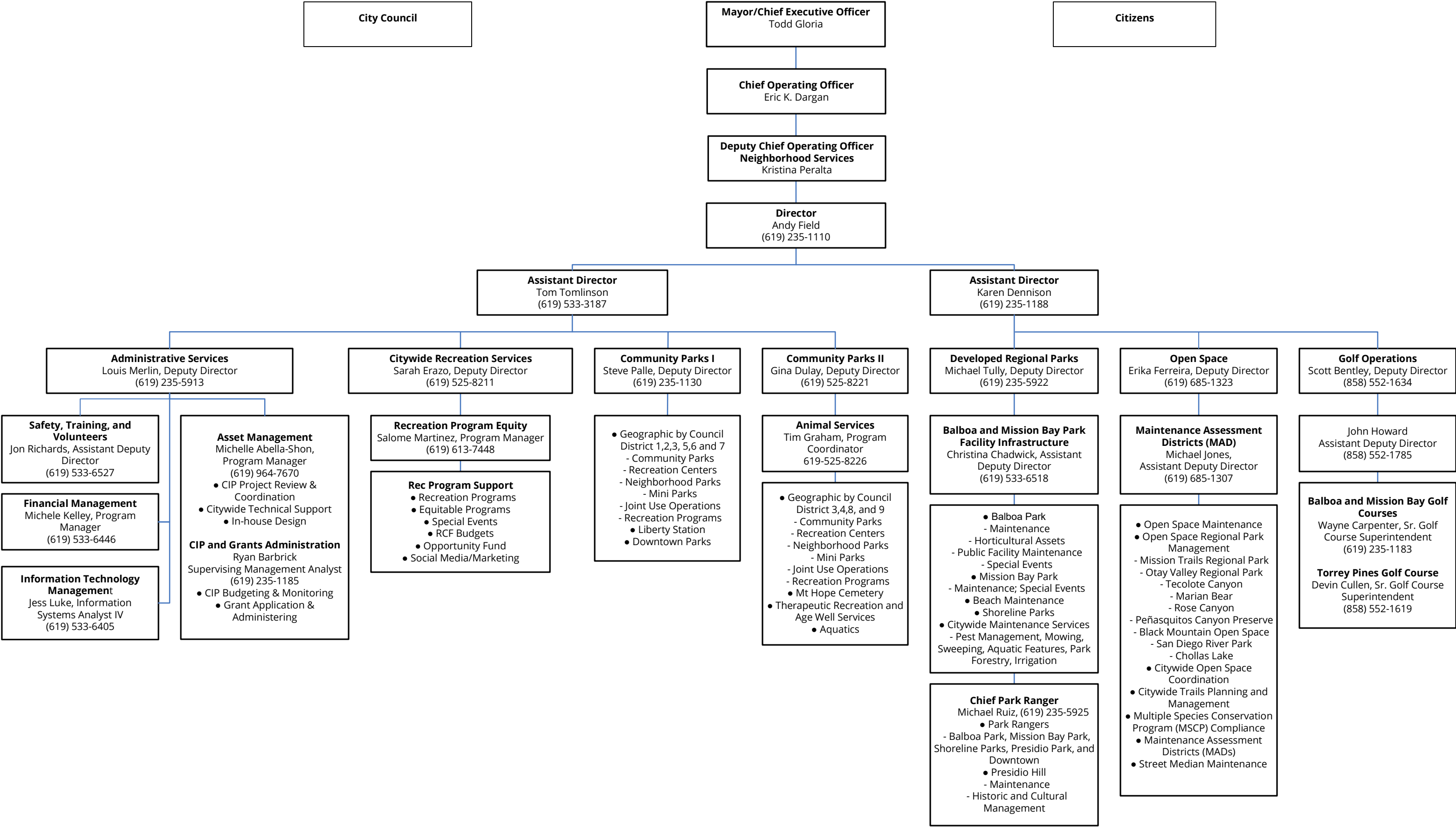
Notice of Next Regular Meeting: May 2, 2023

Notice Posted: <https://www.sandiego.gov/park-and-recreation/general-info/boards/mbpc>

Please Note: If there are any questions regarding this agenda, please contact Mike Rodrigues @ mrodrigues@sandiego.gov. This information is available in alternative formats upon request. To request an agenda in braille, large print or cassette or to request a sign language or oral interpreter for the meeting at least five (5) working days prior to the meeting to ensure availability. Alternative Listening Devices (ALD's) are also available for the meeting, if requested at least five (5) working days prior to the meeting to ensure availability.

CITY OF SAN DIEGO PARKS AND RECREATION DEPARTMENT

January 2023





April 12, 2023

Scott Sandel
Project Manager
City of San Diego - Planning Department
9485 Aero Drive, M.S. 413
San Diego, CA 92123

RE: Comment Letter for De Anza Natural Amendment to Mission Bay Park Master Plan

Founded in 1971, Pacific Youth Soccer League (“PYSL”) is a nonprofit organization that has based its programs in Mission Bay’s De Anza Cove for over 50 years. PYSL is dedicated to the positive development of San Diego’s youth through recreational and competitive soccer programs. PYSL serves the immediate communities of Clairemont, Bay Park, and Pacific Beach, in addition to La Jolla, Mission Valley, University City, Downtown and Mission Hills. We currently organize over 150 teams annually with over 1,600 players between our programs and continue to see greater demand year after year. Due to committed families and a dedicated Board, we remain a nearly all-volunteer league that maintains lower registration fees and offers scholarships for families needing assistance. Soccer is a universal sport shared across gender, ethnicity and race, regardless of income levels, and we are proud to have called Mission Bay home for so many decades. However, our programs are under threat by the current version of the proposed De Anza Natural amendment to the Mission Bay Park Master Plan (“MBPMP”).

Per the proposed De Anza Natural amendment (“Proposed Project”), there is no guarantee that active field space to support organized youth soccer will remain in De Anza Cove – fields that PYSL have relied upon for several decades located at 2701 Grand Avenue. In fact, we continue to honor Bob McEvoy who was instrumental in getting the field dedicated for local youth sports and lights for the

fields that now bear his name. McEvoy Youth Field is PYSL's primary location for recreational soccer programs where all of our soccer games for children under 9 years old are played. The attached exhibit shows PYSL's use of Bob McEvoy Field comprised of six youth fields ranging in size from 30 x 20 yards (for ages 6 and under) to 65 x 45 yards (for ages 9 and under).

It is for this reason the PYSL Board of Directors must share its comments on the City's proposal and recognize two efforts are underway: 1) a proposed amendment to the MBPMP titled De Anza Natural; and 2) a Draft Program Environmental Impact Report ("Draft PEIR") to study the potential impacts associated with the proposed amendment. On behalf of the entire PYSL Board of Directors, this letter serves as our formal comments to the proposed De Anza Natural amendment. We will send our comments on the Draft PEIR under separate cover.

The demand for youth soccer continues to increase and has since the De Anza Natural process began over four years ago. Per our registration records, in 2019 PYSL served approximately 1,400 players comprised of 400 in our spring recreational league, 700 in our fall recreational league, and 300 competitive players as part of our Blast program. This year, we are on target to serve over 1,600 players comprised of approximately 470 in our spring recreational league, 750 anticipated for our fall recreational league, and 400 competitive players now registered in our 2023 Blast program. This is not the time to adopt changes to the MBPMP that would reduce active recreational field space for youth sports – sports that cater to families of varying incomes and ethnicity. This is the time to reinforce active, healthy lifestyles for children and access to youth sports attainable for all of San Diego's families.

The existing Active Recreation acreage is 62.6 acres (ac) per De Anza Natural Figure 2-3. This is comprised of "Mission Bay Tennis Center, Athletic Fields and Golf Course" per the figure. Per De Anza Natural Figure 3, the Proposed Project would remove 2.5 ac of Active Recreation area and reduce the total Active Recreation to 60.1 ac. Further reductions in Active Recreation are proposed in the three Alternatives described in the Draft PEIR. The reduction includes a direct land use change from "Active Recreation" to "Uplands and Buffers" for a linear portion of the Bob McEvoy Field east of Rose Creek – a space actively used by organized youth sports including PYSL soccer programs.

De Anza Natural Figure 16b identifies the space referred to as Bob McEvoy Field as “Existing Dedicated Athletic Fields” which runs adjacent to Rose Creek and has for many years. Information is missing from the documents that disclose and explain the conversion of “dedicated” Active Recreational field area (or “Play Fields” as also referred to in De Anza Natural) to a non-recreational use (i.e., Upland Habitat). Further, what actions would be necessary on the part of the City to divest itself of any dedications intended to maintain youth sports fields at this location? This information must be presented in a clear and transparent manner, including background on “existing dedicated athletic fields,” intent of said dedicated fields, proposed actions associated with the Proposed Project and said dedications, and sufficient analysis and mitigation to compensate for the loss of field space and impacts on other facilities associated with the relocation of youth sports.

Existing MBPMP Figure 14 (Recommendation 30) is clear that locations for recreational facilities for use by organized sports in Mission Bay are allowed, but extremely limited. The Recommendation reads “Given its unique water setting, Mission Bay Park should not be targeted as a location for organized soccer or other league play beyond the existing facilities in Robb Field and Pacific Beach Playing Fields.” This is how the MBPMP currently reads. Note that Bob McEvoy Field is the “Pacific Beach Playing Field” referenced in the Recommendation.

The Proposed Project would reduce the size of Active Recreation space that we have used for decades, fields currently used by thousands of children at the Pacific Beach Playing Fields (i.e., Bob McEvoy Field) – one of two locations deemed acceptable for organized youth sports in all of Mission Bay. However, the De Anza Natural amendment does not address the need for relocating youth sports to other existing recreational facilities and/or the creation of new recreational facilities needed outside of the Mission Bay Park. In lieu, the Proposed Project concludes that options for joint use of the Mission Bay High School’s athletic fields could be considered.

One of the reasons PYSL can maintain low registration fees and offer youth soccer to families of all income ranges is because of reasonable permit fees charged by the City for use of Bob McEvoy Field. The conclusion that youth sports could simply relocate to Mission Bay High School assumes this is a feasible option yet is

not supported by information in the Proposed Project. The reality is that use of Mission Bay High School's facilities as the offset to the Proposed Project's reduction in Active Recreation would increase costs for San Diego's families desiring to play soccer with PYSL. This is because use of Mission Bay High School's facilities are considerably more expensive than use of the City's field at Bob McEvoy. Further, Mission Bay High School has a robust sports program and actively uses its facilities for its students and school sports. As PYSL is a nonprofit organization, we do not carry large profit margins and intentionally keep our registration costs low. However, if forced to relocate programming to Mission Bay High School, registration costs would need to increase, and it is unknown what capacity San Diego Unified School District / Mission Bay High School has for organized youth sports. This means barriers to access for some families and less opportunities for use of Mission Bay for organized sports.

The first Project Objective is to "Provide equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access." Active Recreation is not Regional Parkland, yet the MBPMP considers Active Recreation an important (yet limited) use in Mission Bay. The De Anza Natural plan appears to consider "access" as one in the same. Yet it is not. Trading Active Recreation acreage for Regional Parkland acreage decreases equitable access to De Anza Cove for organized sports and will create barriers to access for some San Diego families as a result.

The reduction in Active Recreation space would directly impact the westerly space at Bob McEvoy Field dedicated for youth sports. Per the attached exhibit, PYSL currently uses this area to facilitate four of six youth soccer fields. As a result, the Proposed Project results in a direct impact on recreation and recreational facilities; however, this is not discussed or addressed in the De Anza Natural plan. The City must address the various consequences to Active Recreation head-on, whether intended or unintended, and not defer the issue to a later (future) step in redevelopment and/or lease opportunities. It is evident that the number of youths participating in outdoor sports is not declining but continues to increase year after year. Since 2019, PYSL's annual registration was 1,400 players and we are on track to serve over 1,600 players in 2023. The De Anza Natural plan does not account for the reality that active recreation for youth sports continues to increase in Mission Bay.

Contrary to conclusions made in the Draft PEIR, the De Anza Natural plan is not consistent with City Recreation Element Goal A and Policy RE-A.3 regarding equitable access to parks and recreation facilities. The consistency statement in the Draft PEIR states that “The project would also retain existing active recreational uses north of the project area.” It is incorrect to state that the De Anza Natural project area “would also retain existing active recreational uses north of the project area” because it proposes to reduce the Active Recreation acreage and provides no guarantee that active recreation uses will continue to be maintained in the Proposed Project. Also note that this statement describes the existing active recreational uses are north of the project area when in fact they are directly in the project area. The location of existing active recreational uses must be corrected as they are within the project area.

The Proposed Project provides no guarantee that the “existing active recreational uses” will be retained. Instead, when describing future “active recreation,” the PEIR explains that “the combination and layout of recreation and athletic facilities would be designed during the General Development Plan (GDP) process and at the time of redevelopment and implementation of project enhancements, and one or more GDPs could cover different areas in the project area.” Contrary to the conclusion in RE-A.3, this is not a guarantee that existing active recreational uses will be retained. Note that the response to comments received during the NOP process regarding active recreational concerns reference the reader to see the response to RE-A.3. As described above, the PEIR’s response to RE-A.3 is not sufficient. Further, the bulk of the RE-A.3 response generally focuses on “enhancing recreational amenities...through the construction of multi-use pathways with designated viewing areas and overlooks...[construct] a sandy beach area, boat facilities, low-cost visitor guest accommodations, surface parking, and associated open space and camping facilities, such as picnic shelters and restrooms.” These components are not active recreation as defined in the Mission Bay Park Master Plan.

The Proposed Project extends the City’s “lease area” west and into the existing dedicated playing fields (see De Anza Figure 11); however, does not sufficiently describe the associated (future) actions to result in new lease areas or the potential impacts associated with new lease areas of existing, non-leased land in Mission Bay Park (and in particular, Bob McEvoy Field). This must be disclosed, explained and sufficiently analyzed as part of the De Anza Natural process.

Active Recreation acreage must be maintained and protected in whatever form of amendment is adopted by the City for De Anza. Specific to organized youth soccer and for the reasons as described above, the PYSL Board of Directors respectfully requests the following guarantees be included in the MBPMP amendment:

- Add to the development requirements of De Anza Natural that guarantees a minimum of 62.6 ac of Active Recreation to be provided in the De Anza Natural Development Criteria and reflected in the Proposed Project description. Ensure that the Draft PEIR also account for this change and update all exhibits and analysis accordingly.
- Add to the development requirements of De Anza Natural that guarantees all future General Development Plans (GDP) shall include a minimum of six youth-sized soccer fields ranging in size from 30 x 20 yards to 65 x 45 yards (reference the attached exhibit).

We appreciate the City's consideration of our comments and formally request this letter be included in the public record and shared with the City Council. Should you have any questions or need additional information, do not hesitate to contact PYSL at president@pyslsoccer.org.

Sincerely,



Volunteer Board President
PYSL Board of Directors
president@pyslsoccer.org

PYSL Inc. dba Pacific Youth Soccer League
P.O. Box 9248
San Diego, CA. 92169
www.pacificyouthsoccer.org

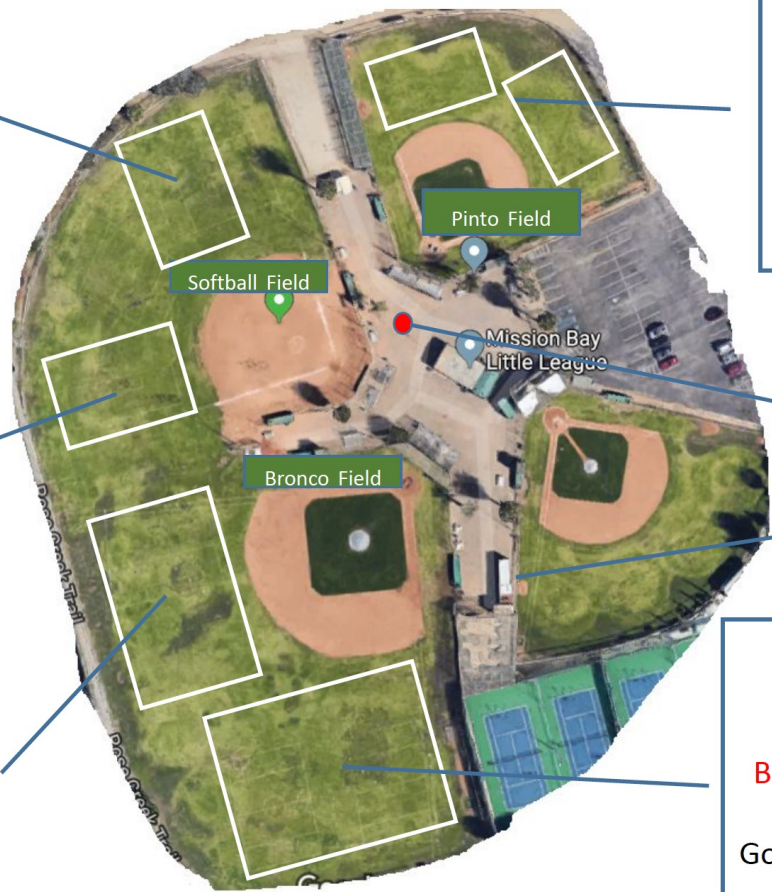
Encl: Bob McEvoy Field Soccer Layout
Existing and Proposed Land Uses at Bob McEvoy Field



McEvoy, Field 4
35 yds x 25 yds
Girls/Girls U8 - 4 v 4
Goal Size: Foldable
4' x 4' PVC

McEvoy, Field 3
35 yds x 25 yds
Boys/Girls U8 - 4 v 4
Goal Size: 4' x 4' PVC

McEvoy, Field 2
55 yds x 35 yds
Build Out Line Required
6 v 6
Goal Size: 6' x 18'



McEvoy 3v3 Fields
2 fields @ 30 yds x 20 yds
B&G U6 - 3 v 3
Goal Size: Assembled
4' x 4' PVC

Lost & Found Bin

Equipment Pick Up

McEvoy, Field 1
65 yds x 45yds
Build Out Line Required
7v7
Goal Size: 6.5' x 18' Game

Existing Land Uses



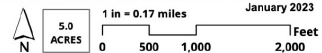
Figure 2-3

Existing Land Uses

De Anza Natural Amendment to the Mission Bay Park Master Plan



Proposed Land Uses



De Anza Natural
De Anza Cove Amendment to the Mission Bay Park Master Plan
Figure 3: Site Plan

January 2023





April 20th, 2023

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

Subject: Comment on the De Anza Natural Amendment and Draft Programmatic Environmental Impact Report from the ReWild Coalition

Dear Planning Committee Staff,

The ReWild Coalition was established in 2019 to advocate for substantial wetland restoration in the northeast corner of Mission Bay Regional Park that was demonstrated to be feasible in San Diego Audubon's ReWild Mission Bay Feasibility Study. In the subsequent three and half years, the ReWild Coalition has advocated for Wildest-acreage wetland restoration as the best option to satisfy the requirements and recommendations of the Mission Bay Park Master Plan and amendment for De Anza Cove with regard to water quality improvement, sea level rise resilience, carbon sequestration, reconnection opportunities for humans, and retention of and improvements to recreational amenities. We have galvanized over 75 member organizations and thousands of community supporters to help steer the City towards a more sustainable plan for Mission Bay. We have invested in the Park by supporting research into carbon sequestration and the economic costs of sea level rise, connecting with schools and inspiring students, surveying endangered species, and celebrating the marsh through community events.

The changes wrought in Mission Bay over the last 75-100 years are immense, with almost total destruction or conversion of the tidal habitats that existed in the bay and the subsequent loss of the human connection to those places. This land use plan is an historic opportunity to restore this much-diminished habitat and natural infrastructure. The project area supports the 1% of natural habitat that remains in Mission Bay and the tidal wetland habitat that will be restored there through this process are critical, critically valuable and under threat throughout the state because of our history of dredging and developing as well as our future of sea level rise and ongoing impacts of development.

Our comments on the Draft Programmatic Environmental Impact Report for the De Anza Natural Amendment to the Mission Bay Master Plan are organized by draft PEIR section of



analysis, with comments about the Amendment itself in the last section of the document. We urge the City to analyze these issues directly and holistically, and revise the draft Programmatic Environmental Impact Report.

De Anza Natural draft PEIR

Executive Summary

S.1.1 Project Location and Setting

1. The Project Location and Setting must include the ecologically-important Rose Creek and Rose Creek estuary mouth as being in the project area. The historic Rose Creek saltmarsh wetlands stretched from what is today's Kendall-Frost Marsh almost to the I-5 southbound on-ramp on Mission Bay Drive across the northeast corner of Mission Bay and into what are now schools and residential areas. In the 1950s and 1960s, the City of San Diego destroyed these and other wetlands in Mission Bay, converting them to other land uses. Over 4,000 acres of nutrient rich habitat for wildlife, migratory and local birds, fish, and mud creatures that are at the bottom of the food chain were destroyed. For over 30 years, community groups and the City of San Diego have been planning on how to restore, revision, and plan for the area of Mission Bay near the mouth of Rose Creek.
2. Much of the water quality issues in the study area are entwined with Rose Creek, and as water quality improvement is the prime focus of the goals of the Mission Bay Park Master Plan for this area, the known water quality impairment should also be addressed in this section. This area is State Tidelands and should be recognized as such in this section.
3. The draft PEIR includes Kendall-Frost Marsh, but does not identify it as being owned and managed by the University of California, San Diego Natural Reserve System. The draft PEIR also incorrectly includes KFM as part of its habitat restoration work (Appendix D, page 18). Please correct these in accuracies.

S.1.2 Project Description

1. The Project Description identifies recreational vehicles as a form of low-cost camping (page S-1 and Biological Resources Technical Report, Appendix D, page 17), which is inadequately analyzed when the guidance from the State Coastal Conservancy is that regional comparisons are required to correctly identify low-cost options (Explore the Coast 2019).
 - a. This report states that "the Coastal Conservancy "is not establishing a set rate for units or projects to be considered lower cost," though based on that 2015 report, \$112/night and \$123/night in peak season met the established criteria. No



reference, report or target demographic has been identified in the draft PEIR. Because existing and/or future facilities might not meet these criteria, impacts from a potential lack of low-cost group camping options are missing from the draft PEIR. Therefore, the draft PEIR does not provide sufficient information to adequately analyze the project effects on low-cost accommodations, which must be provided in the final PEIR

- b. The State Coastal Conservancy's Explore the Coast program specifically calls out the need to diversify our coastal accommodations away from recreational vehicles (Explore the Coast Overnight, an Assessment of Lower Cost Guest Accommodations, 2019) and the draft PEIR should not be specific at this stage of planning on what kind of low-cost guest accommodation will be created. Please provide this clarification.
2. The Project Description states that what we now call Mission Bay is the ancestral lands of the Iipay-Tipay Kumeyaay people, but provides no recognition of their previous stewardship and no specificity about engaging this critical community. Please conduct research and provide this additional information.

S.2. Project Objectives

1. The Project Objectives are written as general project goals rather than project objectives. They are too vague to be used for the purpose of effectively developing the proposed project and evaluating the potential alternatives to the proposed project. The objectives should provide clear, more specific components for each objective. The objectives must also reflect and include relevant requirements and commitments for this portion of Mission Bay Regional Park, such as providing "A large saltwater marsh that enlarges the Northern Wildlife Preserve is proposed west of Rose Creek adjacent to the existing Northern Wildlife Preserve, and along Rose Creek and where the creek merges with Mission Bay." (as specified in the March 2023 Draft De Anza Cove Natural Amendment, page 7). Similarly, the City has committed, pursuant to its RWQCB grant funding (R9-2020-0150 SEP), to create an "expanded wetland alternative [that] would maximize implementable wetland restoration reflective of existing feasibility studies for Mission Bay..." The Project Objectives must be rewritten to provide at least that level of clarity and specificity.
2. The Project Objectives refer to De Anza Cove only, and disregard the other areas of the project identified in the Project Description (S.1.2). These must be revised accordingly.
3. A new Project Objective must be added to "Improve the water quality of the study area and the bay through natural, resilient wetland infrastructure." The draft PEIR is deficient because



it ignores impacts to the proposed De Anza Cove from continued impairment on the 303(d) list.

- a. The Mission Bay Park Master Plan is clear that “[f]oremost in consideration should be the extent to which the Special Study Area can contribute to the Park’s water quality. In fact, additional wetlands creation must be considered as part of the SSA” (MBPMP p53).
 - b. The City of San Diego Notice of Preparation for this draft PEIR also identifies water quality improvement as one of the six listed Project Components.
 - c. In April 2023, the Blue Water Task Force records the Campland sampling location water failing to meet water quality standards 41% of the time for the preceding 12 months. The impact of water quality improvement, and water quality improvement comparison between alternatives is a deficiency of the draft PEIR and must be corrected.
 - d. The ESA Technical Memorandum (attached to this comment letter in its entirety) cautions that “*the PEIR does not include a discussion of the potential impacts to water quality associated with the creation of a channel that connects Rose Creek to De Anza Cove.*”
 - e. The Mission Bay Park Master Plan includes Appendix B-2 Hydrology – Use of Created Wetlands for Stormwater Treatment in Mission Bay by San Diego State University researcher Dr. Richard Gersberg. This Appendix, from 29 years ago, emphasizes the importance and understanding of water quality improvement from restored wetlands—with particular emphasis on the improvement of bay-wide water quality from wetlands in the study area. This Appendix must be included in the draft PEIR and used to analyze how the projects help to meet the new Project Objective for water quality improvement, as stated below.
4. Project Objective 2 is important but the City has not reached out to Kumeyaay and other Indigenous partners to begin this conversation early enough. Writing this PEIR without substantial Tribal input is a colonial point of view on the management of shared natural resources and the City process for partnering with Tribal nations must be improved.

S.5 Summary of Significant Impacts and Mitigation Measures that Reduce the Impact

1. Under Biological Resources (Page S-19), the text states “Would the proposed project interfere substantially with the movement of any native resident or migratory fish or wildlife species...” and found that it would not and proposes no mitigation. Because the preferred project and most alternatives would affect a portion of lower Rose Creek, which supports native species, potentially including native migratory fish as identified by the Regional Water



Quality Control Board, significant impacts could result, which would necessitate mitigation measures. At a minimum, MM BIO 5.3-2 through MM BIO 5.3-5 should be included.

2. The Greenhouse Gas Emission section found no potential impacts because the proposed project would conform to City, regional and state climate plans. However, the proposed project, will eventually involve construction and significant earthmoving/dredging/filling that will have at least temporary elevated GHG emissions. How or whether conformance to those plans would result in no significant project impacts (even if construction period-related only) cannot be assured. Absent more project information including a cut/fill analysis beyond what's given in the draft PEIR or appendices, it is not defensible to state that the project may have no significant emissions. This statement of significance should be set aside until a cut and fill analysis and additional specific emission reduction measures are developed when the project-level EIR or General Development Plan analysis is produced. A significant impact must be identified, and, at a minimum, performance standards and mitigation measures described to address this impact.
 - a. Information from ESA's Technical Review Memorandum states that the *"PEIR provides a cut/fill estimate of 873,886 cubic yards, but it is unclear to what elevations the wetland and upland habitats would be filled. A cut/fill balance analysis should be included to show the project can create wetland habitat and create resilient development. Alternatively, potential air quality, greenhouse gas emissions, traffic and other impacts associated with bringing in additional fill to the site should be evaluated in the PEIR."*
3. Land Use, third row, states that there would be no conflict with the provisions of the MSCP but also states that impacts would be potentially significant. This contradiction needs to be clarified, with mitigation measures identified if impacts would be significant.
4. The draft PEIR does not analyze impacts to the endangered Belding's Savannah Sparrow as the amount of transition zone habitat changes over time. How will the proposed project impact Belding's Savannah Sparrow as sea level rise changes the shoreline?
5. The City of San Diego Subarea MSCP includes the condition for light-footed Ridgway's Rail that "area specific management directives must include active management of wetlands to ensure a healthy tidal saltmarsh environment, and specific measures to protect against detrimental edge effects to this species." Sea level rise will decrease the amount of acceptable core habitat for this species and increase its edge. The De Anza Natural plan needs to identify this as a potential significant impact and propose mitigation measures for it. Please include this analysis.



S.7 Environmentally Superior Alternative.

1. The PEIR states that the “No Project/No Build Alternative” is the environmentally superior alternative because it “would avoid ground disturbance that could result in impacts to subsurface archaeological resources or Tribal Cultural Resources (TCRs), and would reduce the project’s significant and unavoidable impacts on historical, archaeological, and TCRs.” However, the draft PEIR also states that this alternative would not meet some project objectives. (As stated above, those project objectives must be more clear, specific, and address environmental, recreational and all other relevant commitments for the project area.) It is not the superior alternative if it would not meet the essential commitments that the City has made and has similar or more impacts than the other alternatives. See further comments in Section 8 below.

Chapter 2: Environmental Setting

1. The draft PEIR does not provide a complete description of the environmental setting provided in this section as required for projects of Statewide, Regional or Areawide Significance. The proposed project is consistent with California Environmental Quality Act (CEQA) Guidelines Section 15206 Projects of Statewide, Regional or Areawide Significance, because it meets the criteria found in 15206 (b) (4) (C). Because of the project’s effects on multiple endangered species and the statewide history of modification of this coastal habitat type, it also meets the criteria found in Section 15206 (b) (2) -the project “[h]as the potential for causing significant effects on the environment extending beyond the city or county in which the project would be located.” Therefore, the environmental setting discussion for all environmental topics must include statewide and regional setting information. Although the proposed project might not result in significant biological resources impacts, an analysis of statewide and regional adopted land use plans, as well as state climate change policies require biological resource setting information in order to determine whether the project is in conflict with these plans and policies and the extent that they could result in a significant secondary impact or significant cumulative impact to biological resources and climate change effects goals, for example.

2.3.3.2 Biological Resources

1. Table 2-3 Incorrectly lists eelgrass beds habitat as wetland habitat. They should be characterized as jurisdictional aquatic resources (Table 2-5) but they are not identified as wetland habitats by any regulatory agency and need to be identified, mitigated, and/or



restored separately from wetland habitats. Section 113.0103 of the San Diego Municipal Code defines wetlands and eelgrass beds don't meet these criteria:

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

1. All areas persistently or periodically containing naturally occurring wetland vegetation communities characteristically dominated by hydrophytic vegetation, including but not limited to salt marsh, brackish marsh, freshwater marsh, riparian forest, oak riparian forest, riparian woodlands, riparian scrub, and vernal pools;
 2. Areas that have hydric soils or wetland hydrology and lack naturally occurring wetland vegetation communities because human activities have removed the historic wetland vegetation or catastrophic or recurring natural events or processes have acted to preclude the establishment of wetland vegetation as in the case of salt pannes and mudflats;
 3. Areas lacking wetland vegetation communities, hydric soils and wetland hydrology due to non-permitted filling of previously existing wetlands;
 4. Areas mapped as wetlands on Map No. C-713 as shown in Chapter 13, Article 2, Division 6 (Sensitive Coastal Overlay Zone).”
2. This section must include a description of the state-wide, region-wide, and bay-wide loss of tidal wetland habitats to accurately reflect the importance of these biological resources. The Southern California Wetlands Recovery Project Regional Strategy (2018) shows that 62% of Southern California's tidal wetlands have been lost, and in Mission Bay, the percentage is even higher at over 95% of the historic tidal marsh, mudflats and shallow open water have been converted to deeper open water and upland land uses. Most natural habitats in the bay were destroyed by large-scale dredging by the City of San Diego in the post-World War II years with dredge spoils from this process used to create the islands seen today.
3. G. Wildlife Corridors and Habitats: The draft PEIR should discuss the existence of Mission Bay Regional Park along the Pacific Flyway and the establishment of the Park as an Important Bird Area (2014). From the Important Bird Area document: Mission Bay, including the Northern and Southern Wildlife Preserves and the Famosa Slough, was designated as an Important Bird Area of “Global Significance” by the National Audubon Society because the local area supports >1% of the global population of an endangered species, California Least Tern, nine sensitive species (brant, western snowy plover, light-footed clapper rail, long-billed curlew, California least tern, loggerhead shrike, Clark's marsh wren, Belding's savannah sparrow, large-billed savannah sparrow), and sensitive habitat (salt marsh, eel grass, alkali flats, and exposed shoreline). Now that light-footed clapper rail has



been broken into two species, Mission Bay Regional Park is an even larger component of our state- and federally-endangered Light-footed Ridgway's Rail's population.

Chapter 4 Regulatory Framework

4.1.3 Local a. City of San Diego General Plan

1. The draft PEIR is missing an analysis of the environmental justice history and issues in the study area. The only mention of environmental justice in the draft PEIR is a cursory listing under the Land Use and Community Planning Element, but the draft PEIR needs to analyze the access impact of changing the study area land uses and propose ways to increase and restore access in the setting of the entire Mission Bay Regional Park. Restoring wetlands is an increase in access for underserved communities who have not had access to tidal habitat for education, research, personal wellness and quality of life benefits for decades. Improving access to other recreational components throughout the park should be addressed in this draft PEIR and be a goal of future planning processes.

Chapter 5: Environmental Analysis

5.1 Land Use

1. This section is incomplete and must include a more thorough and complete analysis of the following:
 - a. State Lands Commission policies and State code related to Mission Bay Park,
 - b. The San Diego Climate Action Plan's acreage goals for restored tidal wetland,
 - i. The 2022 Climate Action Plan values tidal wetland habitats for their quantity of annual sequestration, but the draft PEIR does not recognize or analyze the beneficial and detrimental drawbacks to the proposed tidal wetland acreage in meeting these CAP requirements. This is a critical missing component of the analysis of the comparison between the Wetlands Optimized Alternative and the preferred alternative.
 - ii. As stated in ESA's Technical Memorandum: *"To meet the goals of the CAP, the City should consider maximizing wetland restoration in the project area as salt marsh restoration provides climate benefits. The "Wildest" and Wetlands Optimized alternatives would provide more carbon sequestration benefits compared to the proposed project by providing more wetlands and better meet project objective 3 (mitigate potential sea level rise impacts)."*
 - c. Mission Bay Park Natural Resources Management Plan,



- d. City of San Diego State Lands Sea Level Rise Vulnerability Assessment, and
 - e. City of San Diego Parks Master Plan.
2. California Coastal Act consistency analysis conclusion regarding coastal dependent uses is incorrect and inadequate because the analysis does not fully consider the definition found in Section 30101 which states "[Coastal-dependent development or use] means any development or use which requires a site on, or adjacent to, the sea to be able to function at all." Clearly, the active recreation uses identified in the preferred alternative are not coastal dependent uses. Therefore, because of the substantial acreage this plan designation and proposed uses would result in a significant impact because of its direct conflict with the Coastal Act. The analysis regarding Section 30255 of the Coastal Act provided in the draft PEIR is therefore incorrect and furthermore provides no evidence for the support of its consistency conclusion.

This Coastal Act conflict would result in a significant impact that must be addressed in Chapter 8.0 Alternatives. In accordance with Section 15126.6, Consider and Discussion of Alternatives to the Proposed Project, "an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the project objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." This means the project alternatives chapter must address all significant impacts, whether or not they are mitigated. The Alternatives Chapter must address alternative locations (Citizens of Goleta Valley v. Board of Supervisors), as well as alternate land uses for the project site to address the active recreational uses identified in the plan that are not coastal dependent and would result in a significant impact. For example, the golf course program could be moved to a nearby course at Tecolote Golf Course or Balboa Golf Course and create many acres of neighborhood recreational amenities and camping accommodations, as well as prioritized wetland restoration. Other options include new tennis courts at the Pacific Beach Taylor Branch Library, shared use of the existing ball fields located on the adjacent Mission Bay High School property, and the creation of a new boat and ski club elsewhere in the Park. These alternatives must be addressed in the Final EIR.

5.1.3e Climate Action Plan

1. The draft PEIR is incorrectly measuring impacts from climate change as this section does not recognize the positive impact of carbon sequestration of tidal wetland habitats to the City achieving its climate action plan goals through the land use plan.
 - a. The 2022 Climate Action Plan values tidal wetland habitats for their quantity of annual sequestration, but the draft PEIR does not analyze the beneficial and detrimental components of the proposed tidal wetland acreage in meeting these



CAP requirements. This is a critical missing component of the analysis of the comparison between the Wetlands Optimized Alternative and the preferred alternative and must be included.

5.3 Biological Resources

1. The draft PEIR is missing impacts from climate change because no analysis has been done of how sea level rise affects the proposal. The impacts to existing and proposed habitats, as well as the proposed location of low-cost guest accommodation being so close to the shoreline, will be impacted as sea levels rise but no analysis is given.
 - The City applied for and received funding from the Regional Water Quality Control Board for this land use proposal through R9-2020-0150 SEP, and must comply with the components of that agreement.
 - Specifically, the City agreed that the “expanded wetland alternative would maximize implementable wetland restoration reflective of existing feasibility studies for Mission Bay...” but the draft PEIR does not reflect the restoration acreage that is shown to be feasible in the ReWild Mission Bay Feasibility Study Wildest Alternative.
 - The City also agreed that the land use plan would result in “the establishment of 80 acres of additional functional wetlands (low-mid-high wetland/salt marsh and mudflats), in addition to the Kendall-Frost Marsh/Northern Wildlife Preserve, at the Year 2100 based on current models utilized by the City for sea level rise projections” but without modeling, the DEIR does not show this condition being met.
 - The City is currently being sued by CERF and Climate Action Campaign to force an achievable CAP implementation plan and this draft PEIR needs to show how the CAP requirement of 700 acres of tidal wetland restoration is achievable if the City does not adopt a plan with maximized wetlands restoration.
 - The City’s De Anza Natural website includes an introduction to the project and states: “Sea level rise modeling developed by the United States Geological Survey for Mission Bay and De Anza has been taken into account during the development of De Anza Natural.” That modeling is not included nor analyzed in the draft PEIR.
 - The San Diego RWQCB adopted ReWild Mission Bay as one of its wetland creation opportunities in 2014, and has multiple beneficial uses that would be reached with maximized wetland restoration in the study area.
 - State of California AB 691 required vulnerability assessments of State Tidelands and the City of San Diego created the State Lands Sea Level Rise Vulnerability



Assessment in 2019. This report, showing modeled impacts from sea level rise at .25m increments up to 2.0m already exists, but, is not mentioned or used in the draft PEIR. The City does claim on its De Anza Natural website that its sea level rise modeling, and as our letter emphasizes, the City is required to model sea level rise by Regional Board's SEP funding, but sea level rise modeling is not provided in the draft PEIR.

- Information from ESA's Technical Review Memorandum emphasizes this: *"...the plan set forth by the City in the PEIR does not include a discussion of a long-term resiliency plan that accounts for future projected sea level rise and does not reference the City's Sea Level Rise Vulnerability Assessment"* and *"[w]ithout a sea level rise assessment, it is not possible to assess the impacts of the project, even at the program level."*
- And, with the sea level rise modeling results of the ESA Technical Memorandum, where they estimated the design of the City's proposal, we now can add quantitative results to demonstrate the need for robust modeling. The memo finds that *"[i]n 2100, mudflat comprises a majority of the total wetlands area at 124 acres while low, mid, and high marsh combined comprise only 28 acres (Figure 2). Because the current plan is estimated to result in mostly mudflat habitat compared to salt marsh habitat, more of the upland and future marsh area should be set as undeveloped and graded at a very shallow slope. This would allow for the salt marsh habitat (low, mid, and high marsh) to have more room to move upslope as sea levels rise and increase the likelihood of this important habitat remaining through 2100."*

5.6 Historical, Archeological, and Tribal Cultural Resources

1. The draft PEIR has incorrectly analyzed the impact of the Historical, Archeological, and Tribal Cultural Impacts by not conducting a Traditional Cultural Properties review. This analysis should be in this draft PEIR and a Full Phase 1 Technical Report done to the National Park standards should be completed.

Chapter 8: Alternatives

1. Draft PEIR Section 8.1.1.2 states that 'other plans' are an important component of a project's feasibility, but, as mentioned in the comments on Section 5.1, the 2021 City of San Diego Parks Master Plan is totally missing from the analysis. That plan needs to be included and all the alternatives need to be weighed against the goals of the Parks Master Plan. Several policies of the Parks Master Plan support prioritizing accessible tidal wetland habitat over other land uses, especially:



- a. CSR2: Improve the quality of habitat in City parks through best practices that support native threatened and endangered species and habitats and consider climate change impacts on species habitat range/ location.
- b. CSR6: Incorporate best practices in the design of parks and selection of plant materials to reduce environmental impacts and promote native, drought-tolerant, resilient landscapes. Prohibit planting species on the California Invasive Plant Council's list of invasive plants for southern California in parks.
- c. CO5: Manage resource and open space parks for their contributions to ameliorate climate change effects.
- d. CO9: Where feasible, allow access to nature and open spaces, in concert with the goals and policies of the Multiple Species Conservation Program and Subarea Plan guidelines.
- e. AC7: Consider using the Kumeyaay language and culturally appropriate images or symbols when naming and renaming recreation facilities, parks, and open space.
- f. AC8: Consider the Kumeyaay historic use of plants and traditional plant names when developing habitat revegetation and restoration plant palettes and interpretive signage along public trails and pathways.
- g. AC9: Consider the Kumeyaay cultural connection to the land and surrounding environment when developing recreational facilities, parks, and open space.
- h. CSR1: Collaborate with agencies that manage public lands, conservation stakeholders, and community advocates to protect sensitive natural and cultural resources, while providing compatible recreational access and outdoor opportunities.
- i. CSR2: Improve the quality of habitat in City parks through best practices that support native threatened and endangered species and habitats and consider climate change impacts on species habitat range/ location.
- j. CSR7: Increase opportunities for people to interact regularly with green spaces, water, and other natural environments – especially in higher density areas.
- k. CSR16: Increase, expand, and manage the network of habitat patches and wildlife corridors for rare, threatened, and endangered species and the vegetation communities that are projected to be impacted by climate change.
- l. CSR 20: Develop new and upgrade existing parks that support environmental development patterns that protect and preserve natural landforms, public and private open space, wildlife linkages, sensitive species, habitats, canyons, and watersheds.
- m. CSR 21: Preserve San Diego's rich biodiversity and heritage through the protection and restoration of open space and wetlands resources, including coastal waters, canyons, creeks, riparian wetlands, and vernal pools.



- n. CSR 27: Maximize opportunities to restore native habitat and enhance biodiversity in parks and open space lands.
 - o. CSR 30: Promote the awareness and value of wetlands, waterways, and restored landscapes in developed parks as well as open spaces.
 - p. PP14: Providing reduced cost or no cost permits to non-profit organizations for programming and events within parks and recreation centers which benefit disadvantaged communities.
2. Water quality is not a goal of the DEIR commensurate with the goals of the underlying, guiding Master Plan document. As stated under S.2 Project Objectives, a new Project Objective to “Improve the water quality of the study area and the bay through natural, resilient wetland infrastructure” must be added.
 3. As stated in preceding comments, the project objectives are insufficient because they are neither sufficiently clear and specific to understand how they are used to develop and evaluate the proposed project and alternatives, nor do they incorporate significant commitments that the City has made regarding wetlands expansion, water quality improvements and even recreational/low-cost accommodations. The project objectives should be revised, include more specificity, and a table prepared to demonstrate how – or not – each alternative conforms to them. As a general statement about the final section of each alternative’s assessment (Relationship to Project Objectives), they provide varying if not different kinds of “evidence” (with no specific criteria) to support how the alternative meets or does not meet – in full or partially – the six objectives. The draft PEIR needs to provide a table that uses consistent, clear, and more specific criteria to summarize how the alternatives are determined to meet or not the objectives – modified as we have recommended in preceding comments.
 4. Information from ESA’s Technical Review Memorandum highlights the connection between this deficiency and the Project Objectives: *“By prioritizing and increasing habitat restoration in the project area, the area can provide diverse recreational opportunities that are currently not available in the entire Mission Bay Park, including kayaking and birding in or near wetland areas. The PEIR describes the expanded marshland/habitat and upland (dune, sage) and buffer areas as places for recreational opportunities in Section 3.3.1.2 but does not count these areas as active recreation. Limiting the definition of active recreation to land-based activities gives the impression that the creation of habitat will reduce recreation in the project area. However, maximizing the restored habitat within the project area would better meet objective 5 (diversify active and passive recreational uses) by providing significant recreational opportunities, including kayaking and walking paths to observe wildlife, that are coastal-dependent uses currently lacking in Mission Bay Park.”*

8.2.1.2 Rationale for Elimination



1. The information provided in this section is unclear and insufficient to determine how a project meets an objective satisfactorily. The Project Objectives do not provide enough specificity to reasonably discriminate among the alternatives. They are inadequate to be used to develop and evaluate a proposed project and alternatives. Nowhere in the PEIR is there a substantive elucidation of what the project objectives should involve and they fail to satisfactorily incorporate the City’s existing commitments for both environmental, recreational, and low-cost accommodations within the project area.
2. The draft PEIR has arbitrarily and incorrectly determined that the ReWild Mission Bay Wildest Alternative and the De Anza Natural Wetlands Optimized Alternative do not meet the Project Objectives, and the draft PEIR must be updated to correct this.
 - a. Project Objective 1: We do not agree with the draft PEIR’s conclusions: “However, the Wetlands Optimized Alternative would not meet project objectives 1 and 6 because, compared to the proposed project, it would not as fully provide equitable access or enhance the public access of De Anza Cove. The Wetlands Optimized Alternative would convert the southern portion of the developed De Anza “boot” and the De Anza Cove open water areas to wetlands. This would result in a reduction in low-cost visitor guest accommodations and open beach uses.” Nor do we agree that Wildest would not provide enough equitable access to the coastal landscape.
 - i. The project objectives do not identify any specific set of criteria for “equitable access or enhance public access” or what number of low-cost accommodations and level of beach uses or what level of active and passive recreational uses are desired and appropriate. Absent clarity on those project objectives – and as we reiterate on all project objectives – this is not a justified conclusion with adequate supporting documentation.
 - ii. Mission Bay Regional Park has 19 miles of sandy beaches and 9 official swimming areas, but has no accessible tidal marsh habitat. The Wildest and Wetlands Optimized Alternatives are the best alternatives to improve equitable access to recreational opportunities that don’t exist at all in the Park.
 - iii. The current land uses in the northeast corner of the bay have an unfortunate history of blocking public access to our shared shoreline, and that impact is not addressed in the draft PEIR. A consent decree issued by the Coastal Commission in September of 2021 showed the long history of blocking public access in an over \$1 million agreement between the lessee and the Commission.



- iv. The draft PEIR states that all the ReWild Alternatives “reduce access to the Cove’s shorelines,” but as stated previously the Project Objectives should not be specific to the Cove as there are numerous other pieces to the study area and the existing sandy shoreline is over-represented in the Park as a whole, and accessible tidal ecosystems are drastically under-represented.
 - v. When the draft PEIR is improved to include consistency review with the Parks Master Plan, multiple policies in that City document support the equitable access improvements that can come from restored habitats, and help bolster the value of access to restored natural places for all San Diegans, including underserved and Indigenous communities.
 - vi. ESA’s Technical Memorandum finds that “[b]y creating more wetlands, both the Wetlands Optimized Alternative and the “Wildest” Alternative provide greater opportunity for all communities to access this unique habitat and enhance public access in Mission Bay.” Also finding that “the project should be considered in the context of Mission Bay as a whole. Mission Bay Park has extensive beach areas for public access; therefore creation of more wetlands rather than public beach areas should be considered a benefit, not a negative. The City should consider adjusting the Wetlands Optimized alternative to increase the low-cost visitor guest accommodations and remove all or portions of the golf course, which is not a coastal dependent use while prioritizing wetlands in order to meet project objectives 1 and 6.”
- b. Project Objective 2: The draft PEIR’s conclusion that Wildest does not meet this Objective is incorrect. Kumeyaay communities cannot reconnect to De Anza Cove, because De Anza Cove was artificially made in the last 75 years. For millennia, local tribal nations engaged with the salt marshes that once existed throughout much of Mission Bay. The salt marsh plants, birds, wildlife, and fish are what constitutes reconnection, not access to a European-American redesign of the natural environment. The ReWild Coalition’s members and discussions with Tribal partners have shown that local Tribal nations want space to reconnect to the tidal habitats for harvesting.
- i. When the draft PEIR is improved to include consistency review with the Parks Master Plan, multiple policies in that City document support the equitable access improvements that can come from restored habitats, and help bolster the value of access to restored natural places for all San Diegans, including underserved and Indigenous communities.
 - ii. The reason for the Wetland Optimized Alternative satisfying this Objective but not the Wildest alternative is unclear.



existing land uses. There are currently substantial barriers to providing access to functioning tidal ecosystems in the City of San Diego and in Mission Bay Regional Park because those spaces have been modified and taken away from all San Diegans. These alternatives do not reduce the area for aquatic recreation uses, but instead change the kinds of recreational uses.

- a. More tidal wetland acreage results in more active recreation (culturally-informed harvesting, fishing, biking), passive recreation (birding, walking, wheelchairing, kayaking, paddleboarding) and educational opportunities.
 - b. These recreational uses are not currently available in Mission Bay Regional Park at all. The addition of these activities to the Bay would greatly balance the recreational opportunities at the Bay-wide scale.
 - c. The Coastal Act recognizes the aesthetic value of natural habitats, stating “the scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance.”
 - d. Restored and accessible tidal wetland habitats in the study area would be one of the most accessible of its type in San Diego, with the new public transit stops at the Balboa Ave. transit station helping people get to this regional asset, specifically helpful for underserved communities.
3. Wetlands Optimized Alternative. The draft PEIR states this alternative would be consistent with the SANDAG Regional Plan, enhance access and safety getting to the site and encourage multimodal transportation options, both locally and outside the local area. However, the analysis later identifies that this alternative would have lower or similar GHG emissions while causing higher VMT (because of a reduction in low-cost accommodations and other recreational activities that would then force potential visitors to use other facilities outside the project area). It is unclear how much re-directed travel would occur and, if much of that driving originated outside the local area, whether it would even be significant. Please provide substantial evidence such as the number of users of these facilities by zipcode to support this conclusion, or change the conclusion, if appropriate.
4. Neither the Enhanced Wetlands/Optimized Parkland Alternative nor Resiliency Optimized Alternative appear to meet the (current) project objectives. It is unclear how the draft PEIR can conclude that the Environmentally Superior Alternative is the No Project when, as described above, it has many potentially greater impacts than the proposed project and, from our review and assessment, than the Wetlands Optimized Alternative. The draft PEIR does not adequately justify that conclusion.

Mission Bay Park Master Plan Amendment comments:



1. De Anza Cove should be for non-motorized boats only. Please include an analysis of the impacts on wetlands and water quality from non-motorized and motorized watercraft. This should include an acknowledgement that multi-modal travel goals include non-motorized watercraft.
2. The low-cost visitor accommodation land use on the island needs to showcase resilient recreation opportunities with no permanent structures and no private motorized vehicle access. This will facilitate a resilient park and ecosystem as sea levels rise.
3. The draft PEIR should define low-cost visitor accommodation and include an analysis of how the park will reach their target demographic of low-cost visitors.
4. Education, ecotourism, and stewardship of the Bay should be an integral piece of the accommodation land use.
5. Must keep the buffers to wetland habitat called for in the City's Development Code and buffers should not include walkways or lighting
6. Prioritize native species planting palettes in Regional Parkland
7. #26: we support the removal of guaranteed swimming
8. #53: we support the amendment proposal that water quality in the De Anza Cove swimming area will be monitored to determine suitability for water contact activities.

Conclusion

The City's De Anza Natural draft PEIR is a positive step forward from the current land uses and from the 2018 plan, but there is significant progress still to be made. We applaud the City's increased focus on wetland restoration, acknowledgement of the need to empower 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 an example of the city beginning to prioritize restored habitats and resilient infrastructure, but the ReWild Mission Bay Wildest-level acreage of restored habitats and the prioritization of wetland restoration is the best plan for the City. We submit these comments as improvements to move San Diego forward.

A new Project Objective needs to be added to prioritize water quality improvement in the plan. Sea level rise modeling that shows 80 acres of additional restored tidal wetland habitat is needed at this stage of planning. The City's Climate Action Plan Strategy 5 wetland restoration goals must be used as a benchmark for comparing the alternatives. The draft PEIR must value recreational opportunities from restored, functional habitats and rebalance the recreation at a bay-wide scale where accessible tidal wetlands for active and passive opportunities don't exist. With those improvements, the PEIR will show that the ReWild Wildest plan and the Wetlands Optimized Alternative meet more Project Objectives than the preferred project.



Thank you for the opportunity to comment, and the member organizations of the ReWild Coalition are excited to get to the next, community-informed stage of planning for the northeast corner of the bay, and then begin restoring our connections to the park.

Sincerely,

The ReWild Mission Bay Coalition Members:

American Academy of Pediatrics: San Diego
and Imperial Counties

AFT Guild, Local 1931

American Bird Conservancy

Aqua Adventures

Audubon California

Beautiful P.B.

Bike SD

Buena Vista Audubon Society

California Native Plant Society

Casa Tamarindo

Center for Local Government Accountability

Citizens Coordinate for Century 3

Clean Earth for Kids

Climate Action Campaign

The Climate Reality Project San Diego

Coastal Policy Solutions

Coffee Cycle

Community Congregational Church of Pacific
Beach

Corona Enterprises

Earth Discovery Institute

Endangered Habitats League

Environmental Center of San Diego

Environmental Health Coalition

Epsilon Eta

Friends of Famosa Slough

Friends of Mission Bay Marshes

Friends of Rose Canyon

Friends of Rose Creek

Groundwork San Diego

Islamic Center of San Diego

Kai Pono Solutions

Latino Outdoors

Law Office of Michelle A. Gastil

League of Women Voters of San Diego

McCullough

Mission Bay Fly Fishing Co.

Montgomery-Gibbs Environmental Coalition

Native Like Water

Nature Collective

Ocean Connectors

The Ocean Foundation

Outdoor Outreach

Paradise Gardeners

Pacific Beach Democratic Club

Pacific Beach Rotaract

Renascence

Rose Creek Watershed Alliance

St. Andrew's by-the-Sea Episcopal Church

San Diego 350

San Diego Audubon Society

San Diego Canyonlands

San Diego City College Audubon Club

San Diego City College SACNAS Chapter

San Diego Coastkeeper

San Diego County Democrats for Environmental
Action

San Diego Democrats for Equality

San Diego EarthWorks

Fiesta Island Dog Owners

San Diego Green New Deal Alliance

San Diego Pediatricians for Clean Air

San Dieguito River Valley Conservancy

SD Children and Nature

Save Everyone's Access

Sierra Club San Diego

Southwest Wetlands Interpretive Association



Stay Cool for Grandkids
 St. Dunstan's Episcopal Church
 Strong Hearted Native Women's Coalition
 Surfrider San Diego
 Sustainability Matters

Unite Here! Local 30
 Urban Corps
 Waste for Life
 The White Sands Green Committee
 Wildcoast

ALTERNATIVE 3: WILDEST



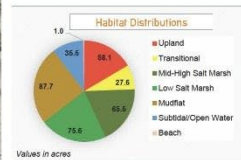
LEGEND

Study Area	Public Access & Recreation
Restoration Focus Area	Passive and Active Recreation with Appropriate Buffer
Proposed Channel	Existing Bike and Pedestrian Path
Existing Channel	Existing Pedestrian Path
Restored Habitat Type	Proposed Bike and Pedestrian Path
Upland	Proposed Pedestrian Path
Transitional	Proposed Interpretive Path
Mid-High Salt Marsh	Proposed "Fence Walk"
Low Salt Marsh	Boat Launch/Storage Optional Location
Mudflat	Visitor Center Optional Location
Subtids	Visitor Parking Optional Location
	Interpretive Landform or Structure
	Educative Science Center



- 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.

ReWild Mission Bay Wildest Alternative



memorandum

date April 18, 2023

to Andrew Meyer, San Diego Audubon Society

cc

from Annie Roberts, Lizzie Schalo PE and Lindsey Sheehan PE, Environmental Science Associates

subject Technical Review Memorandum for the De Anza Natural Amendment to the Mission Bay Park Master Plan Draft Program Environmental Impact Report, Sch #2018061024

This memorandum provides a technical review of and comments on the City of San Diego's Draft Program Environmental Impact Report for the De Anza Natural Amendment to the Mission Bay Park Master Plan (PEIR), including a technical analysis of projected habitat change and resiliency with future sea level rise. In particular, this memorandum discusses why the "Wildest" alternative proposed in the ReWild Mission Bay: Wetlands Restoration Feasibility Study Report (2018) and the Wetlands Optimized alternative are environmentally superior alternatives to the proposed project.

1. Land Use Considerations

Both the Wetlands Optimized Alternative and the "Wildest" Alternative better meet the project objectives than the proposed project because they create more wetland habitat and provide equal amounts of active recreation as described further below.

1.1 Project Relation to Entire Mission Bay Park

1.1.1 Wetland Habitat

This project offers a unique opportunity to restore wetland habitat in Mission Bay Park; a land use that cannot be created anywhere except along the coast. The Wetlands Optimized Alternative and the "Wildest" Alternative would better meet project objective 4 (restoring and safeguarding natural habitats) because they would provide 297 acres and 315 acres of expanded marshland and buffer habitat, respectively, compared to the 265 acres of expanded marshland and buffer habitat in the Proposed Project.

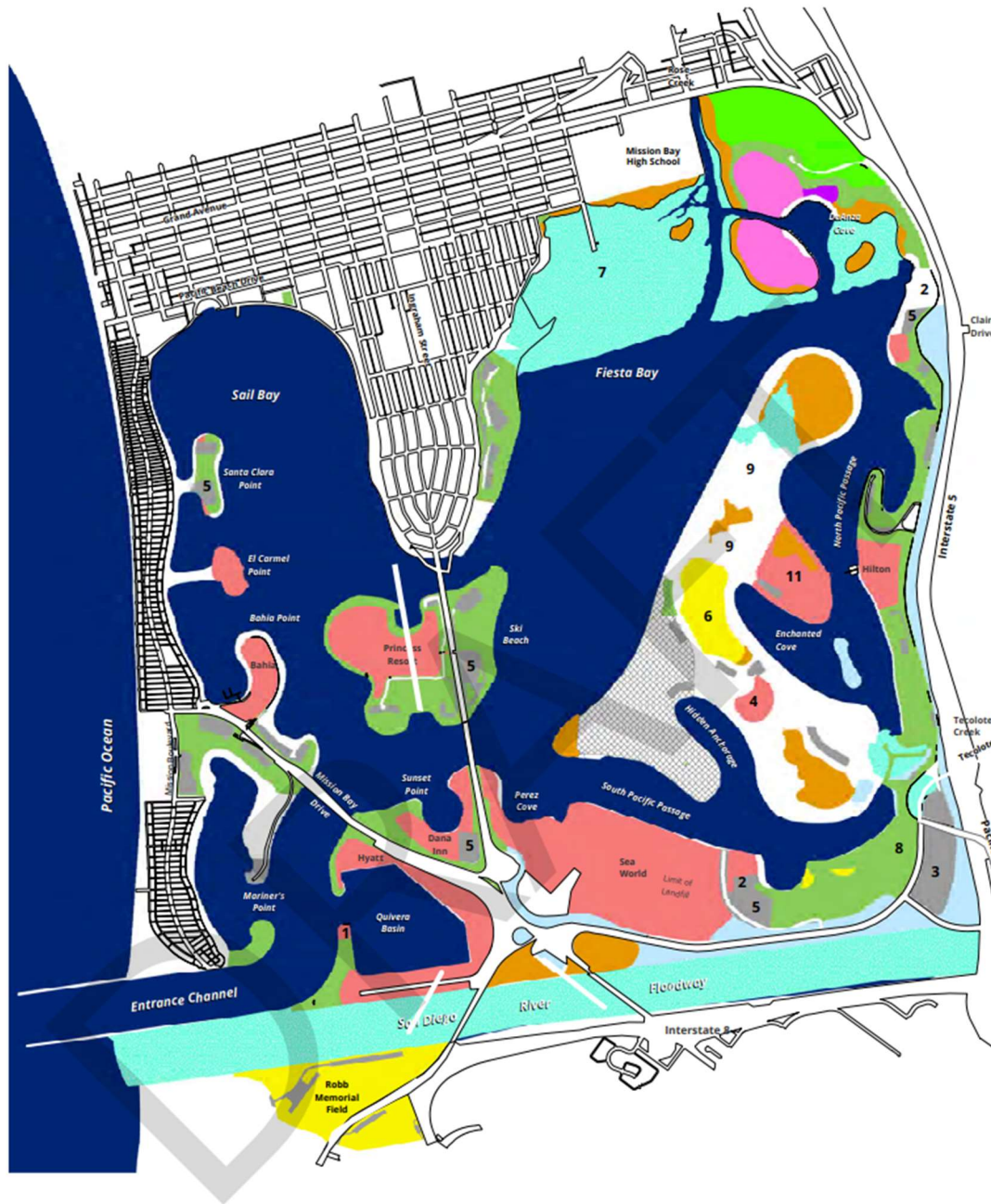
Since the project would take place in the Coastal Zone, the project is considered a project of statewide, regional, or areawide significance (see the requirements set forth in Section 15206 Projects of Statewide, Regional or Areawide Significance). By specifically focusing on the diversity of land use in the project area and not Mission Bay as a whole, the PEIR does not consider this plan in the larger context. From the Draft Land Use map

provided in the 2023 Mission Bay Park Master Plan Amendment (**Figure 1**), most of the perimeter of Mission Bay is designated as parkland, active recreation, open beach, or play fields, while a minority is designated as wetland habitat. A large portion of the designated wetland habitat that is included is the San Diego River Floodway, which is disconnected from Mission Bay. Also, note that the San Diego River downstream of W. Mission Bay Bridge is designated as wetland habitat, but is actually mostly “open water”. Land use decisions should be based on an assessment of acreages of land use types for the entire Mission Bay Park as well as an analysis and assessment of land use by land use type.

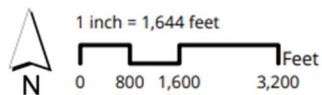
1.1.2 Active Recreation

The current Land Use map underestimates the availability of space for active recreation that already exists in Mission Bay. The PEIR defines active recreation as activities including “land-based active recreational pursuits, including sand volleyball, over-the-line, walking, bicycling, and in-line/roller skating” (pg 2-4). **Figure 2** shows that there are significant areas of Mission Bay that could be considered active recreation and that are not shown on the Land Use map, including playfields, walking/biking paths, and lease area active recreation, including Sea World, Quivira Basin, and Mission Bay Yacht Club. The City of San Diego’s website advertises “close to 14 miles of bike paths along Mission Bay.”¹ The PEIR also states that “regional parkland supports activities such as picnicking, kiteflying, Frisbee throwing, informal sports, walking, jogging, bicycling, and in-line/roller skating” (pg 2-4). By this definition, all of the regional parkland could be considered active recreation areas. There are also significant portions of Mission Bay that could be considered open water active recreation. The land use map and analysis should include all types of active recreation for the entire park.

¹ <https://www.sandiego.gov/park-and-recreation/parks/regional/missionbay/waterland>



Mission Bay Park San Diego, California



Land Use

DRAFT: February 2023

1. Park Headquarters & Harbor Patrol/Police Station
2. R/V Parking (Day-Use)
3. Overflow Parking
4. Primitive Camping
5. Boat Ramp/Trailer Parking
6. Sand Arena
7. Northern Wildlife Preserve
8. Public Amphitheater & Promenade
9. Sand Management
11. Youth Camping

LEGEND

- Lease Areas
- Open Beach
- Parkland
- Play Fields
- Wetland Habitat
- Upland Preserves
- Coastal Landscape
- Dog Park
- Active Recreation
- Low Cost Visitor Accommodations
- Boat Facilities/Clubhouse

Figure 1. Draft Land Use map from the 2023 Mission Bay Park Master Plan Amendment



Figure 2. Draft Land Use map with additional areas that could be considered Active Recreation

1.2 Wetlands Provide Recreation Opportunities

The City has the opportunity to provide a variety of recreation options beyond what is shown as active recreation in the proposed project. In the area planned as “active recreation” on the site plan, the project proposes to use the space for athletic fields and courts and potentially retain the existing golf course. The planned active recreation options, including the existing golf course, are not coastal-dependent uses as defined and required by the Coastal Act. By prioritizing and increasing habitat restoration in the project area, the area can provide diverse recreational opportunities that are currently not available in the entire Mission Bay Park, including kayaking and birding in or near wetland areas. The PEIR describes the expanded marshland/habitat and upland (dune, sage) and buffer areas as places for recreational opportunities in Section 3.3.1.2, but does not count these areas as active recreation. Limiting the definition of active recreation to land-based activities gives the impression that the creation of habitat will reduce recreation in the project area. However, maximizing the restored habitat within the project area would better meet objective 5 (diversify active and passive recreational uses) by providing significant recreational opportunities, including kayaking and walking paths to observe wildlife, that are coastal-dependent uses currently lacking in Mission Bay Park.

2. Sea Level Rise and Climate Change Considerations

AB 691 requires agencies managing State Tidelands, including the City of San Diego, to proactively plan for sea level rise. As a result, the City prepared a State Lands Sea Level Rise Vulnerability Assessment (ICF 2019). Section 3.4 of the PEIR states that the “PEIR programmatically addresses the environmental impacts of future implementation of the project using realistic, worst-case assumptions and establishes a mitigation strategy that would apply to future improvements.” However, the plan set forth by the City in the PEIR does not include a discussion of a long-term resiliency plan that accounts for future projected sea level rise and does not reference the City’s Sea Level Rise Vulnerability Assessment.

2.1 Sea Level Rise Resiliency

The project area is vulnerable to future sea level rise. In the City’s Sea Level Rise Vulnerability Assessment (ICF 2019), ICF used U.S. Geologic Services (USGS) data to map sea level rise around Mission Bay, as shown in **Figure 3**. A zoomed in version of the USGS data for 6.6 feet of sea level rise with a 100-year storm for the project area is shown in **Figure 4** (CoSMoS v3.0; Barnard et al. 2018). It should be noted that these maps do not show extreme Rose Creek discharge, which will have additional flooding impacts.

In both Section 5.7.3.1 and Appendix I, the PEIR mentions: “With implementation of the Proposed Project, De Anza Cove is expected to experience lowered levels of inundation and velocities by 2100 compared to if the area is left in its current state, as a result of proposed wetland restoration activities, which would increase resilience to sea level rise and coastal flooding.” However, the report does not include a sea level rise assessment nor discussion of impacts due to potential adaptation strategies that will be needed to protect developed areas, such as sea walls, revetments, or berms. Without a sea level rise assessment, it is not possible to assess the impacts of the project, even at the program level.

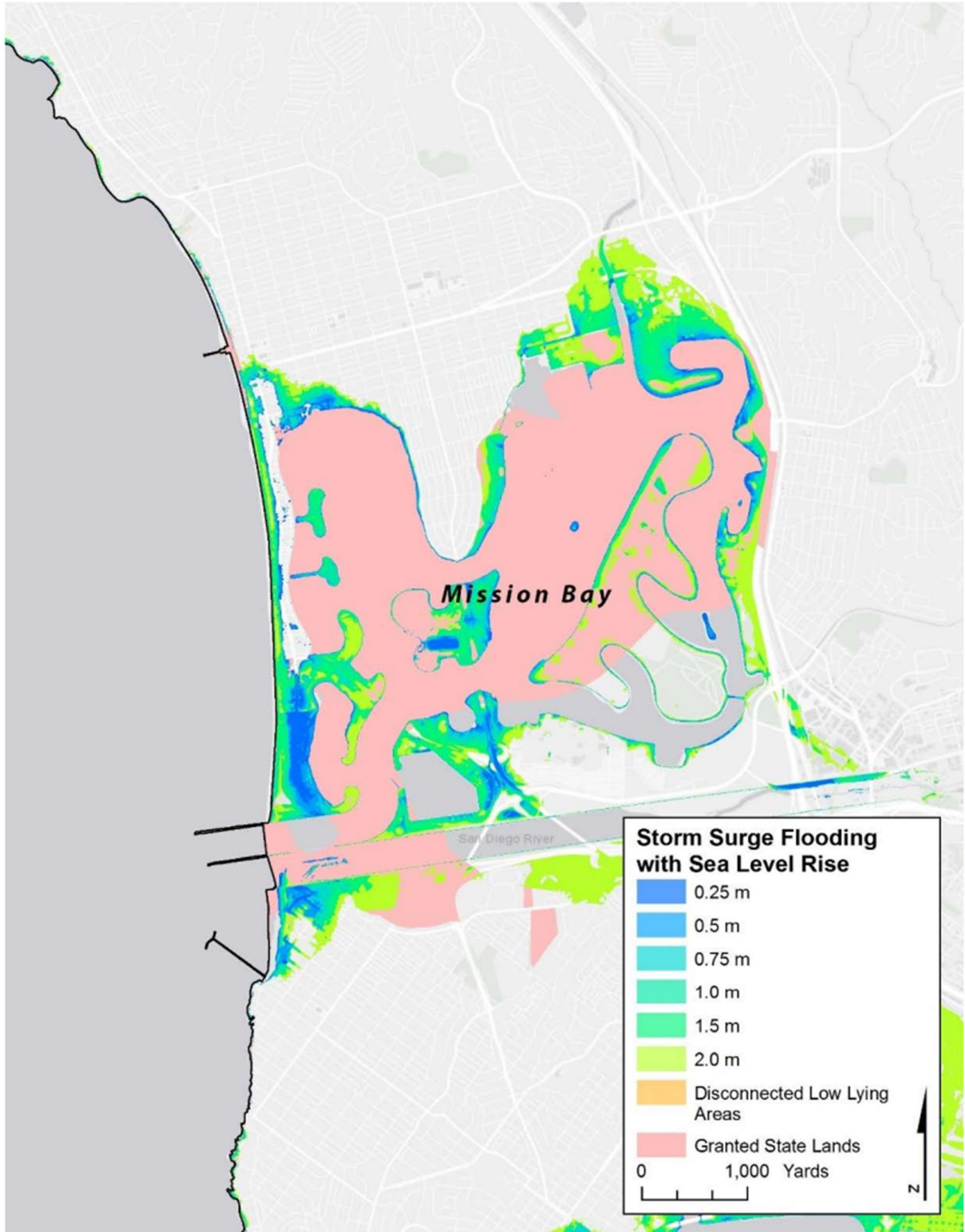


Figure 3. Mission Bay exposure to storm surge and sea level rise.



Figure 4. Projected flood exposure data from the USGS Coastal Storm Modeling System (CoSMoS v3.0; Barnard et al. 2018), accessed via the Our Coast Our Future web platform (Point Blue Conservation Science and USGS 2023).

2.2 SEP Habitat Requirements

According to the Supplemental Environment Project (SEP) required by the RWQCB, the PEIR must fully analyze an expanded restoration alternative that will result in 80 acres of wetland by the year 2100. Without a sea level rise analysis, the PEIR cannot show how the Wetlands Optimized alternative will result in 80 acres of wetland by the year 2100.

ESA developed a habitat evolution model for the Wetlands Optimized alternative (Attachment A) assuming all habitat shown in the figure would start as salt marsh. Assuming 3.6 feet of sea level rise by 2100 would result in only 28 acres of salt marsh remaining at the end of the century, with the majority of the site (124 acres) converting to mudflat. To meet the intention of the SEP, the City may consider reducing the amount of development surrounding the habitat and including more upland habitat that would allow the wetland to move upslope within the planning horizon of this plan, similar to the “Wildest” alternative, which would result in 75 acres of wetland by 2100.

2.3 Cut/fill Balance

The PEIR notes that the preferred alternative would balance cut and fill onsite, but a basic description or grading plan is not provided. Substantial fill will be needed to create the desired wetland acreage, and additional fill may be needed to raise developed areas to make them resilient to sea level rise. In Section 5.2.3.2, the PEIR states that

“future grading and excavation quantities are currently unknown.” The PEIR provides a cut/fill estimate of 873,886 cubic yards, but it is unclear to what elevations the wetland and upland habitats would be filled. A cut/fill balance analysis should be included to show the project can create wetland habitat and create resilient development. Alternatively, potential air quality, greenhouse gas emissions, traffic and other impacts associated with bringing in additional fill to the site should be evaluated in the PEIR.

2.4 Greenhouse Gases and Carbon Sequestration

The City of San Diego seeks to achieve a goal of net zero GHG emissions by 2035 (City of San Diego 2022). The City’s Climate Action Plan (CAP; 2022) identifies a restoration target of 350 acres of salt marsh land by 2030 to provide resiliency, air quality, and public health benefits, and 700 acres by 2035.

National and international organizations, as well as state and federal agencies, have become increasingly interested in exploring the carbon storage and sequestration capacities of wetlands, especially salt marshes, mangroves, and seagrass beds (see for example Smardon 2019). Peer-reviewed scientific literature has demonstrated the great significance of these ecosystems for both carbon sequestration and storage (Pendleton et al. 2012; Fourqurean et al. 2012). To meet the goals of the CAP, the City should consider maximizing wetland restoration in the project area as salt marsh restoration provides climate benefits. The “Wildest” and Wetlands Optimized alternatives would provide more carbon sequestration benefits compared to the proposed project by providing more wetlands and better meet project objective 3 (mitigate potential sea level rise impacts).

3. Public Access

In Section 8.3.2.3, the PEIR says “the Wetlands Optimized Alternative would not meet project objectives 1 and 6 because, compared to the proposed project, it would not as fully provide equitable access or enhance the public access of De Anza Cove.” Currently, the only public access to wetlands in Mission Bay is during Love Your Wetlands Day at Kendall Frost Marsh, which occurs once a year, and during the UC San Diego Natural Reserve System and San Diego Audubon’s Wander the Wetlands program, for two hours twice a month. A fence around the site keeps the public out during the rest of the year. While public access to wetlands certainly should be balanced with protection of the habitat, wetlands are a unique coastal landscape that are currently restricted in Mission Bay for almost all San Diegans. Public access to wetlands can include walkways by the shoreline of the wetland, blinds to enhance opportunities to observe wildlife, some boardwalks through the wetlands and a kayak trail for access at higher tides, as described in the “Wildest” Alternative design in the ReWild Mission Bay Restoration Feasibility Study Report (2018). By creating more wetlands, both the Wetlands Optimized Alternative and the “Wildest” Alternative provide greater opportunity for all communities to access this unique habitat and enhance public access in Mission Bay.

Additionally, Section 8.3.2.3 notes that increasing wetlands “would result in a reduction in low-cost visitor guest accommodations and open beach uses.” As discussed under the Land Use Considerations section, the project should be considered in the context of Mission Bay as a whole. Mission Bay Park has extensive beach areas for public access; therefore creation of more wetlands rather than public beach areas should be considered a benefit, not a negative. The City should consider adjusting the Wetlands Optimized alternative to increase the low-cost visitor guest accommodations and remove all or portions of the golf course, which is not a coastal dependent use while prioritizing wetlands in order to meet project objectives 1 and 6. Similarly, while the ReWild options do not

include details on the development that could occur in the project area, the “Wildest” alternative provided sufficient space to create a comparable area of low-cost visitor guest accommodations.

4. Impacts to Water Quality

The Mission Bay Master Plan Amendment (2023) states that an important consideration of the project area “should be the extent to which the area can contribute to the Park’s water quality.” Due to the high importance of water quality to the project, the project should include an additional objective to enhance water quality and water circulation within De Anza Cove.

The PEIR explains that pollutants generated through construction activities will be addressed through a SWPPP and the implementation of construction best management practices (BMPs). Potential long-term pollutants would be addressed through project area and source control BMPs. A SWQMP would be prepared to ensure that runoff is adequately captured and/or treated. However, the PEIR does not include a discussion of the potential impacts to water quality associated with the creation of a channel that connects Rose Creek to De Anza Cove. A water circulation study will be an important next step to size the channel and determine whether the channel will make the water quality in De Anza Cove measurably worse.

5. Impacts to Eelgrass

A significant amount of new wetland habitat shown on the site plan requires the fill of open water in existing eelgrass beds. The PEIR describes the placement of fill to raise elevations for marsh habitat as the creation of new wetland habitat. A more accurate description would be the conversion of habitat from eelgrass to wetland. The PEIR addresses the removal of eelgrass habitat and describes the San Diego Biological Guidelines (SDBG) required mitigation ratio of 2:1, where 1:1 mitigation must occur within Mission Bay. However, the PEIR does not include a description of where and how eelgrass habitat will be mitigated nor an assessment of the potential impacts of such mitigation.

6. Tribal Nation Reconnection Opportunities

The PEIR does not describe how any alternative would or would not meet objective 2 (foster opportunities for members of local Tribal nations to reconnect). In Section 8.3.2.3, the PEIR states that “The Wetlands Optimized Alternative would meet project objective 2 by fostering opportunities for members of local Tribal nations to reconnect to De Anza Cove.” However, in Section 8.2.1.2, the PEIR states that the ReWild alternatives “would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove,” but with no explanation of how this conclusion was reached. At the program level, there is still an opportunity to work with tribes to adjust any of the project alternatives to provide opportunities for tribal reconnection. At this point, there is no justification for eliminating the ReWild alternatives based on objective 2.

7. Conclusions

The PEIR should include specific criteria for determining whether an alternative meets a project objective or not. For example, in the PEIR, there is no basis specified for determining whether a project alternative meets or does not meet the project objectives related to land use (objectives 4 and 5) and which project objective takes priority. The PEIR states “the Wetlands Optimized Alternative would not fully implement project objective 5, as active and passive recreational uses would be further reduced” (pg. 8-43). Following this logic, the preferred alternative

would not meet project objective 4 because restoration of habitats would be reduced compared to the Wetland Optimized Alternative and the “Wildest” Alternative. As discussed above, given the larger context of Mission Bay Park, achieving project objective 4 should take precedence over achieving project objective 5.

Table 1 provides a summary of the Proposed Project, Wetlands Optimized Alternative, and “Wildest” Alternative as they relate to the project objectives.

Table 1. Relationship of Proposed Project, Wetlands Optimized Alternative, and ReWild “Wildest” Alternative to Project Objectives

Objective	Proposed Project	Wetlands Optimized Alternative	ReWild “Wildest” Alternative
1. Provide equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access.	<ul style="list-style-type: none"> 48.5 ac low-cost visitor guest accommodations 	<ul style="list-style-type: none"> 27.4 ac of low-cost visitor guest accommodations, which could be expanded to match the proposed project by changing/removing the golf course Would increase access to wetlands which are currently restricted 	<ul style="list-style-type: none"> Developed areas were not detailed out in the Feasibility Study, but left space that can be used to match the area of the low-cost visitor guest accommodations in the proposed project Would increase access to wetlands which are currently restricted
2. Foster opportunities for members of local Tribal nations to reconnect to De Anza Cove.	The PEIR includes no description of how any alternative would or would not meet this objective. At the program level, there is still an opportunity to work with tribes to adjust any of the project alternatives to provide opportunities for tribal reconnection.		
3. Incorporate climate adaptation strategies to increase resilience to climate change and mitigate potential sea level rise impacts.	<ul style="list-style-type: none"> 37.4 ac upland habitat and buffer areas for sea level rise transition habitat 140.5 ac of marsh to provide carbon sequestration benefit 	<ul style="list-style-type: none"> 46.1 ac upland habitat and buffer areas for sea level rise transition habitat 250.9 ac of marsh to provide carbon sequestration benefit 	<ul style="list-style-type: none"> 85.7 ac upland habitat and buffer areas for sea level rise transition habitat 227 ac of marsh to provide carbon sequestration benefit Cut/fill fully analyzed and balanced on site, so no soil transportation emissions
4. Embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats within De Anza Cove.	<ul style="list-style-type: none"> 140.5 ac marsh 	<ul style="list-style-type: none"> 250.9 ac marsh Allows more access to marsh to encourage public stewardship through exposure 	<ul style="list-style-type: none"> 227 ac marsh Allows more access to marsh to encourage public stewardship through exposure
5. Diversify active and passive recreational uses that will serve a range of interests, ages, activity levels, incomes, and cultures both on land and in water.	Maximizing the restored habitat within the project area would provide significant recreational opportunities, including kayaking and walking paths to observe wildlife, that are coastal-dependent uses currently lacking in Mission Bay Park. Most of the perimeter of Mission Bay is designated as parkland, active recreation, open beach or play fields, while a minority is designated as wetland habitat.		
6. Enhance public access and connectivity within De Anza Cove and increase connections to the surrounding communities, including opportunities for multimodal travel.	<ul style="list-style-type: none"> Would provide open beach area, which is plentiful in Mission Bay Would provide tennis center, athletic fields, and a golf course which are not coastal-dependent uses 	<ul style="list-style-type: none"> Would increase access to wetlands which are currently restricted 	<ul style="list-style-type: none"> Would increase access to wetlands which are currently restricted Includes walkways by the shoreline of the wetland, blinds to enhance opportunities to observe wildlife, some boardwalks through the wetlands, and a kayak trail for access at higher tides
Recommended additional objective: 7. Contribute to the improvement of the Park’s water quality.	<ul style="list-style-type: none"> 140.5 ac of marsh to provide water quality benefits Redirecting Rose Creek to De Anza Cove may impact water quality in the cove 	<ul style="list-style-type: none"> 250.9 ac of marsh to provide water quality benefits Redirecting Rose Creek to De Anza Cove may impact water quality in the cove 	<ul style="list-style-type: none"> 227 ac of marsh to provide water quality benefits Sea level rise modeling shows that tidal marsh acreage persists through 2100, and that wetland benefits to water quality will continue through the century

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Attachment A. Sea Level Rise Technical Assessment

To assess whether the Wetlands Optimized alternative would meet the SEP requirement of 80 acres of wetland by 2100, ESA performed a technical analysis of projected habitat change (i.e., habitat evolution) and resiliency with future sea level rise.

Sea Level Rise Projections and State Guidance

Projections of global sea level rise are well-documented and investigated, with recent research projecting sea level rise on the order of 2 to 10 feet by 2100 in California (e.g., Cayan et al. 2008; Griggs et al. 2017). This research has been used to develop a series of policy guidance documents by the State of California that recommend including specific amounts of sea level rise in project planning and design, the most recent being the California Ocean Protection Council's (OPC) State of California Sea Level Rise Guidance (OPC 2018). The OPC (2018) Guidance includes tables of projected relative sea level rise at well-established tide gages located along the coast of California through 2150 for a range of risk aversion scenarios, including low, medium-high, and extreme (e.g., H++). Table 1 shows the projections for San Diego Bay, which is the closest water level gauge to Mission Bay. These projections were developed and summarized with the intention that local planning and design efforts would have a consistent and accepted basis for addressing future sea level rise.

The California Coastal Commission (CCC) updated their Sea Level Rise Policy Guidance in 2018 (CCC 2018). The CCC (2018) Guidance provides a basis for selecting the time horizon and the risk level of the project, which are used to define the appropriate sea level rise amounts. The OPC Guidance identifies three levels of risk to consider when planning for sea level rise (blue boxes in Table 2-2):

- The low risk aversion scenario is appropriate for adaptive, lower consequence decisions (e.g., unpaved coastal trail), but is not adequate to address high impact, low probability events.
- The medium-high risk aversion scenario is appropriate as a precautionary projection that can be used for less adaptive, more vulnerable projects or populations that will experience medium to high consequences as a result of underestimating sea level rise (e.g., coastal housing development).
- The extreme risk aversion scenario is appropriate for high consequence projects with little to no adaptive capacity and which could have considerable public health, public safety, or environmental impacts (e.g., coastal power plant, wastewater treatment plant, etc.).

Table 1. Projected Sea Level Rise (in feet) for San Diego

		<i>Probabilistic Projections (in feet) (based on Kopp et al. 2014)</i>				<i>H++ scenario (Sweet et al. 2017) *Single scenario</i>
		MEDIAN	LIKELY RANGE	1-IN-20 CHANCE	1-IN-200 CHANCE	
		<i>50% probability sea-level rise meets or exceeds...</i>	<i>66% probability sea-level rise is between...</i>	<i>5% probability sea-level rise meets or exceeds...</i>	<i>0.5% probability sea-level rise meets or exceeds...</i>	
			Low Risk Aversion		Medium - High Risk Aversion	Extreme Risk Aversion
High emissions	2030		0.4 - 0.6	0.7	0.9	1.1
	2040	0.7	0.5 - 0.9	1.0	1.3	1.8
	2050	0.9	0.7 - 1.2	1.4	2.0	2.8
Low emissions	2060	1.0	0.7 - 1.3	1.7	2.5	
High emissions	2060	1.2	0.9 - 1.6	1.9	2.7	3.9
Low emissions	2070	1.2	0.9 - 1.6	2.0	3.1	
High emissions	2070	1.5	1.1 - 2.0	2.5	3.6	5.2
Low emissions	2080	1.4	1.0 - 1.9	2.4	3.9	
High emissions	2080	1.9	1.3 - 2.5	3.1	4.6	6.7
Low emissions	2090	1.6	1.0 - 2.2	2.9	4.8	
High emissions	2090	2.2	1.6 - 3.0	3.7	5.7	8.3
Low emissions	2100	1.7	1.1 - 2.5	3.3	5.8	
High emissions	2100	2.6	1.8 - 3.6	4.5	7.0	10.2
Low emissions	2110*	1.9	1.3 - 2.7	3.5	6.4	
High emissions	2110*	2.8	2.0 - 3.7	4.7	7.5	12.0
Low emissions	2120	2.0	1.3 - 3.0	4.1	7.6	
High emissions	2120	3.1	2.3 - 4.3	5.5	8.8	14.3
Low emissions	2130	2.2	1.4 - 3.3	4.6	8.6	
High emissions	2130	3.5	2.6 - 4.9	6.3	10.2	16.6
Low emissions	2140	2.4	1.5 - 3.6	5.1	9.8	
High emissions	2140	3.9	2.8 - 5.4	7.1	11.7	19.2
Low emissions	2150	2.5	1.5 - 3.9	5.7	11.1	
High emissions	2150	4.3	3.0 - 6.1	7.9	13.3	22.0

Wetlands Optimized Alternative Analysis

To assess the potential area of habitat remaining in 2100 in the Wetlands Optimized Alternative, the OPC 2018 low risk aversion scenario (high emissions) was selected. The low risk aversion scenario (3.6 ft of sea level rise by 2100) is likely to occur and is not as extreme as the medium-high scenario.

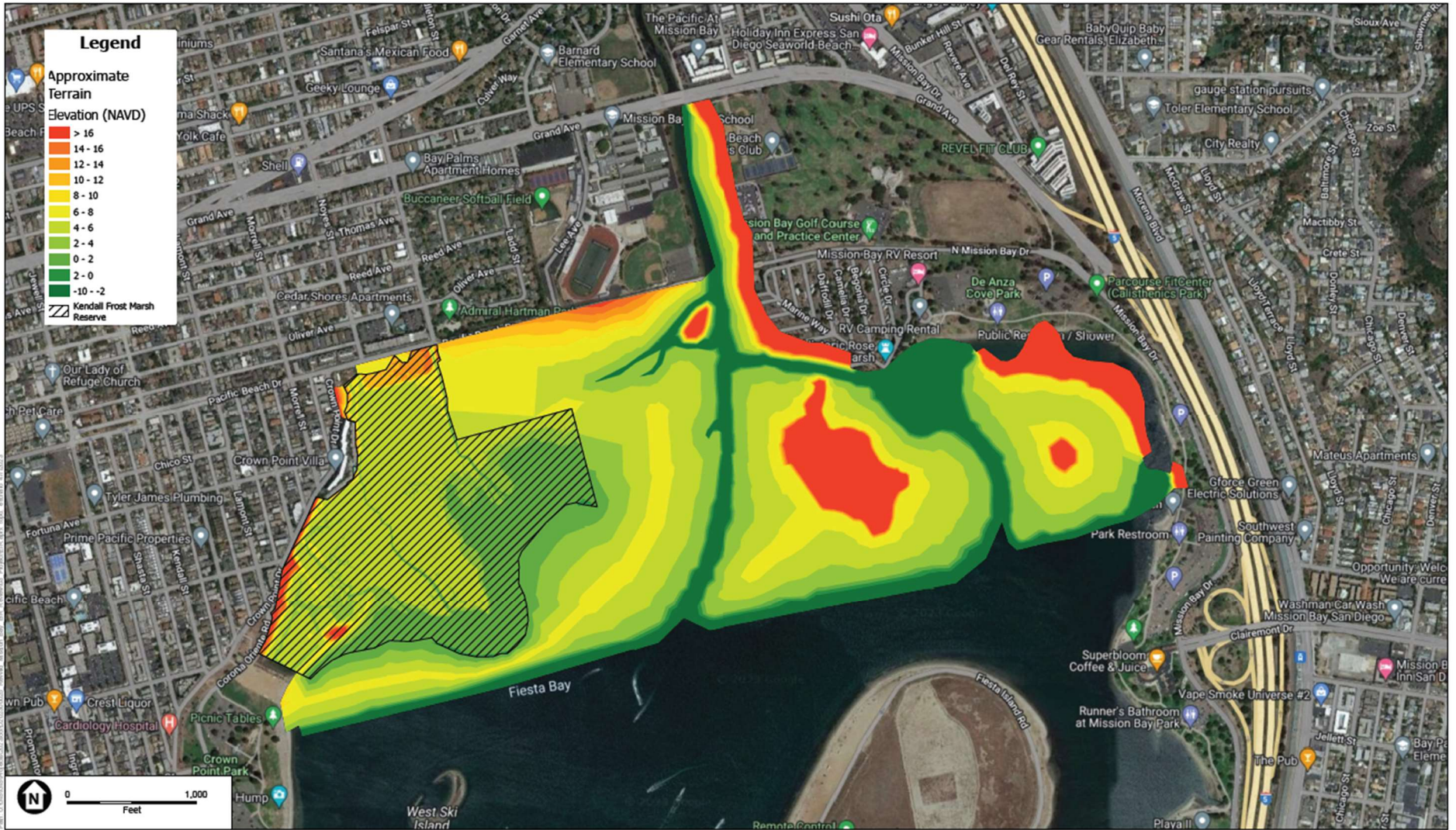
Zones of general topographic suitability for various tidal and tidally-adjacent habitat types can be defined based on the elevation of the area relative to tidal datums (i.e., as a surrogate for the frequency of tidal inundation). Based on an assessment conducted in South San Diego Bay (ESA 2020), salt marsh habitat typically exists between 2.9 to 6.9 ft NAVD. Below 2.9 ft NAVD, the inundation frequency would be too great to maintain marsh vegetation species, and mudflat or subtidal habitat would occur. Above 6.9 ft NAVD, the habit would transition to upland habitat. As sea levels rise, habitat elevation bands rise with it. By 2100, with 3.6 ft of sea level rise, salt marsh habitat is expected to occur between 6.5 and 10.5 ft NAVD.

Marsh habitat acreages for 2100 were estimated for the Wetlands Optimized Alternative using the wetlands and uplands areas in PEIR Figure 8-1. ESA developed an approximate terrain by assuming an elevation of 2.9 ft NAVD (lowest saltmarsh elevation discussed above) at the edge of the proposed wetland, an elevation of 6.9 ft NAVD at the inland wetland boundary, and a maximum of 3:1 slope. Varying terrain was assumed in some areas to provide a range of marsh elevations in wetland areas including a high marsh ridge line in the proposed wetland adjacent to Kendall-Frost Marsh, a high marsh ridgeline along the southwest point of the proposed marsh island, and a mid-marsh dip between the two upland areas east of De Anza Cove. The approximate terrain is shown in Figure 1. As mentioned previously, the terrain is entirely assumed based on the wetland extent provided by the PEIR. The PEIR does not provide information about habitat distribution or topography within the wetland area.

Table 2 shows the results of the analysis. Total wetland area in 2100 (including mudflat, but not including Kendall-Frost Marsh) is estimated to be approximately 152 acres. In 2100, mudflat comprises a majority of the total wetlands area at 124 acres while low, mid, and high marsh combined comprise only 28 acres (Figure 2). Because the current plan is estimated to result in mostly mudflat habitat compared to salt marsh habitat, more of the upland and future marsh area should be set as undeveloped and graded at a very shallow slope. This would allow for the salt marsh habitat (low, mid, and high marsh) to have more room to move upslope as sea levels rise and increase the likelihood of this important habitat remaining through 2100.

**TABLE 2
HABITAT ACREAGES WITH SEA-LEVEL RISE**

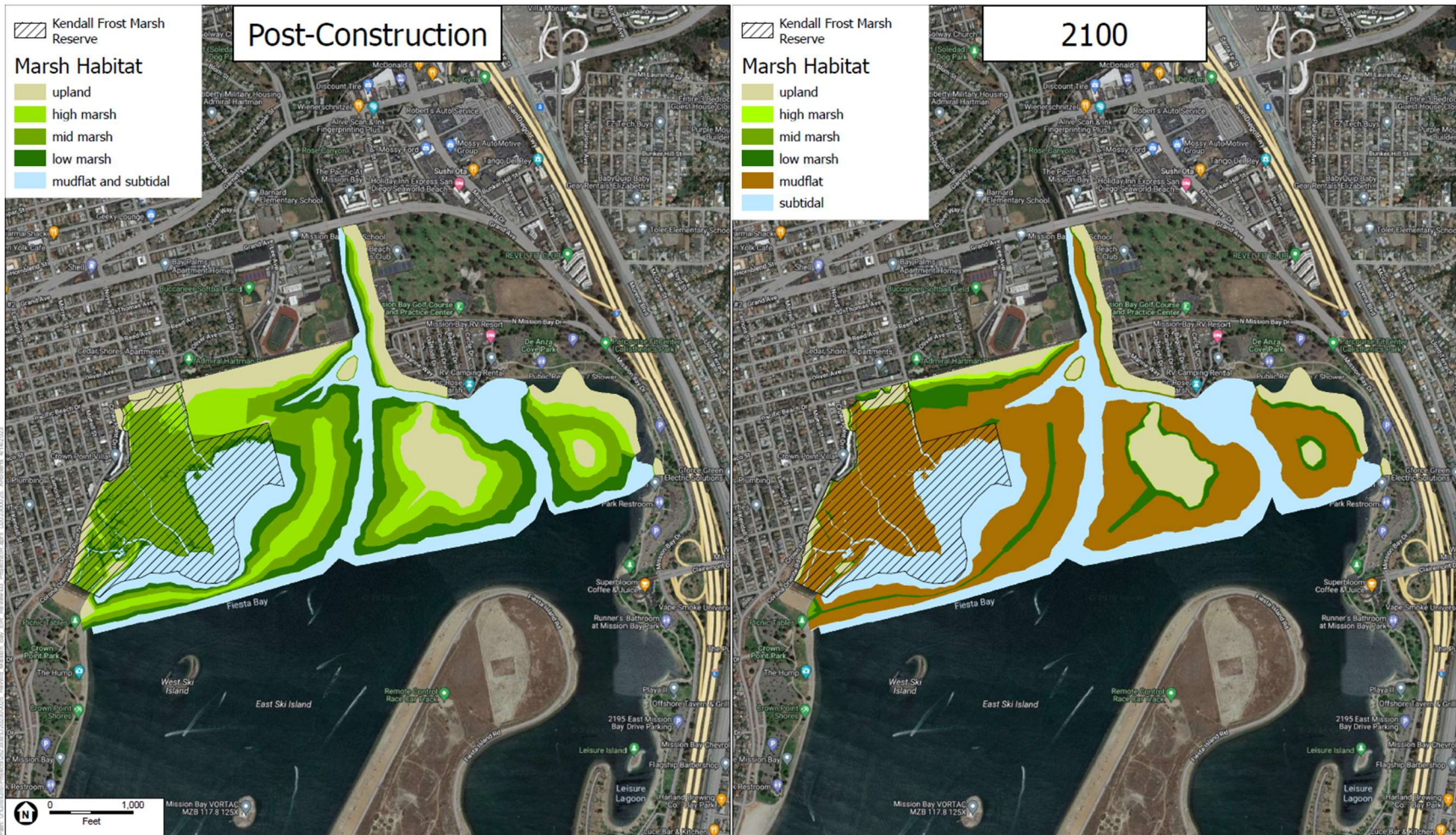
Habitat	Elevation Band (feet NAVD)	Post-Construction (acres)	With 3.6 ft of Sea Level Rise in 2100 (acres)
Upland	> 6.9	49	37
High Marsh	5.7 to 6.9	48	3
Mid Marsh	4.1 to 5.7	60	5
Low Marsh	2.9 to 4.1	46	20
Mudflat	-0.4 to 2.0	0	124
Subtidal	< -0.4	67	81



SOURCE: ESA, 2023

ReWild Mission Bay EIR Review

Figure 1
Wetlands Optimized Alternative Approximate Terrain



SOURCE: ESA, 2023

ReWild Mission Bay EIR Review

Figure 2
Wetlands Optimized Alternative Marsh Habitats
Post-Construction (Left) and 2100 (Right)





November 9, 2022

City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123

Attention: Ms. Jordan Moore, Senior Planner
Project Name: De Anza Cove Amendment to the Mission Bay Park MP
Community Plan Area: Mission Bay Park
Council District: 2

Dear Jordan and City Planning Department:

I write this letter of concern as the current chair of the City of San Diego Municipal Golf Committee (SDMGC), which also represents the position of our entire group. The Mayor and City Council appoint our committee to serve as a citizens' advisory group to the City's Golf Division, and to voice opinions and observations concerning the public golf courses directly operated by the city, which are Torrey Pines Golf Course (*home of 2008 and 2021 US Opens*), Balboa Park Golf Course and Mission Bay Golf Course.

The Mission Bay Golf Course (MBGC) represents almost 25% of the project area covered by the original De Anza Revitalization Plan, which appeared originally to be added without any golf representation on the original local user advisory subcommittee. SDMGC also writes this as a voice for the many San Diego golfers who strongly support that the MBGC should not be a part of this current project and for it to remain as an 18-hole public golf course as it currently exists today.

The MBGC should be recognized as a shining example of a facility that meets ALL the values of the Mission Bay Park master plan meets a majority of the important values such as Land Use; Air Quality; Biological Resources; Energy Conservation; Greenhouse Gas Emissions; Health and Safety; Historical, Hydrology/Water Quality; Noise; Public Services and Facilities; Public Utilities; and Visual Effects and Neighborhood. More importantly, MBGC brings *great societal, environmental, and recreational benefits to our community*. It will even continue to do even better with the current dollars and improvements that have been provided by the city's golf course division which has been in planning for many years to improve its facilities and infrastructure.

Land Use

Golf is a major recreational land use in San Diego, and MBGC has long been part of its golfing, recreation, and tourist community for *over 68 years*. It is a well-used public, 18-hole, Par 58, 2700-yard golf course operated by San Diego's Golf Division. The course is used by all types of playing customers that includes San Diego residents, tourists, visitors, children, junior high

schoolers, high schoolers, seniors, disc golfers, and foot-golfers. The course also has an almost new (5-6 years) golf driving range and practice area that is shared by the same group and sometimes even those that do not even play golf. MBGC is considered an executive course or “alternative golf course” meaning that it is composed of many par threes and a few par four holes that can be played in a couple of hours. The golf industry has learned over the years that a sizable percentage of golf courses all over our region are exceedingly long and hard and that people almost have to be a PGA professional to enjoy a round of golf. “Alternative golf courses” are diverse, shorter, affordable, and more enjoyable to many of the new and future levels of golfers. MBGC is very affordable and user-friendly to the public in that you do not have to own an expensive set of clubs to play the course, pay outrageous green fees for access, and be an expert golfer to enjoy your round of golf. These types of “Alternative golf courses” are trending everywhere and on the rise throughout the country; and are being built by more municipalities because of their unique social, recreational, and revenue-generating opportunities. They are less intimidating, welcome more casual golfers, are an excellent place to network, practice and introduce new golfers to the game while providing excellent meeting and hospitality venue options.

A few examples of the rise in popularity of these alternative golf courses are Goat Hill Park in Oceanside, California, a par 65 course, has thrived based on a partnership with Linksoul and John Ashworth. Oaks North, Balboa Park, Pine Glen, Reidy Creek, and Loma Santa Fe are a few of the San Diego area short executive courses. Golf Digest is currently in the later stages of developing a list to rank the top alternative golf courses in the United States. MBGC is the perfect facility for this exciting time in golf. Limitless possibilities exist for improving, marketing, and continuing to promote the virtues of MBGC within the Mission Bay Park recreational experience.

MBGC has long served as a pipeline to the bigger public golf courses in San Diego like Torrey Pines, Balboa Park and Coronado golf courses. If you talk to any regular at these and other golf courses, they will know someone (if not themselves) that first learned to golf at MBGC.

Public Services and Facilities

Golf is important in providing affordable municipal services to the public using its facilities. It is important to understand that *municipal golf reflects diversity in California*, be it thru gender, ethnic, racial, and lifestyle in addition to economic and class diversity. Municipal golf represents the playgrounds for the working and middle classes, not the privileged. MBGC offers recreation for all ages, from the youngest of children to the oldest of seniors. As the game’s numbers pertain to accessible golf, the SCGA states that **22 percent of all California courses are municipal**, though it is estimated that 45 percent of all golf is played across those courses daily. In the fiscal year of 2021, the MBGC contributed rent payments of \$301,082 to the General Fund which would be reduced proportionately if there is a reduction in the acreage of the golf course. *The use of this area for parkland instead of the golf course would increase General Fund expenses per acre by \$15,206 per year if it were turned into general parkland.* There were over 102,000 rounds played at MBGC in the 2021 fiscal year plus thousands of users of the range, practice facilities, and footgolf.

We want to convey to you the unique role MBGC plays in affordable and accessible public golf throughout the city. *MBGC is A LOCAL TREASURE* because of its practice facilities, unique

layout, and holes which enable a complete golfing experience. Its importance to younger and older golfers because of its length and walkability *cannot be ignored as a healthy recreational activity.*

We encourage everyone to come out and see the nine hundred (900) students from twelve (12) high schools throughout the city who use MBGC as an essential part of their practice and high school competitions. We are excited that *the city is smartly investing \$12,000,000 in MBGC to upgrade the clubhouse and golf course irrigation system*, using allocated Golf Enterprise funds, to build a more up-to-date and attractive facility. *These improvements are expected to further enhance the experience and revenues of MBGC and the city by offering a variety of events perfect for your corporate cocktail hours, dinner meetings, birthday celebrations, breakout sessions, social picnics, weddings, and more.* We encourage you to come out to see the ladies club that regularly plays at MBGC every week. Many of the members of the ladies club are retirees who enjoy the relaxed layout and setup of this alternative course.

MBGC is also unique in that it is *the only night-lit course in the city* where kids can practice after school in the winter. It also provides a unique recreational experience to the citizens of San Diego by providing a robust program for footgolf and disc golf. These are additional attractive and healthy recreational alternatives for kids after school.

Air Quality; Biological Resources; Energy Conservation; Noise; Greenhouse Gas Emissions; Visual Effects and Neighborhood

It would be regrettable not to recognize the positive role that MBGC currently plays in protecting ecosystems that benefit the neighborhoods directly. *MBGC preserves open space and provides a buffer (Visual and Sound) for the Bay from existing commercial, residential, and vehicular uses.* The course's tree canopies assist in sequestering carbon and *help to minimize GHG* from nearby vehicular arterials and freeways. The minimal use of hardscape, the groves of trees, and growing turf areas help global warming by *producing oxygen and cooling/reducing record elevated temperatures within the surrounding areas.* The course also *promotes biodiversity and filters/recharges rainwater* into groundwater basins thereby protecting these same areas. The course also *protects and provides a significant habitat supportive of bird life* and may obtain certification by Audubon International as an environmentally well-planned and operated golf facility.

Thanks to the Golf Course Superintendents Association of America (GCSAA), best management practices (BMPs) for golf courses have improved by 180 degrees and *MBGC will be using this advanced technology.* The San Diego golf division has long adopted these measures and *utilizes the BMPs to cover everything from water management to pollinators to energy use.* The irrigation systems will *utilize smart irrigation control systems, water and moisture sensors, and drought-tolerant choices for turf grasses.* Reclaimed water will also improve water usage and conservation efforts when utilized. Also, more *electric and battery-operated equipment will translate into additional zero-emissions opportunities and help reduce noise and air pollution which provides a healthier work environment for wildlife, users, and the workforce.*

Current Status and Trends

With 72 golf courses in every conceivable setting from mountains to desert to ocean, it is no wonder *Golf Digest named San Diego one of the Top 50 golf tourism destinations in the world.*

Golf is also currently thriving in the COVID world. It provides one of the only activities that can still go forward with proper social distancing. It is expected that most of the people who started the game of golf during the peak of COVID, will remain golf enthusiasts which translates into *more people playing golf than ever*. The numbers support this. In July 2021, there was *an 89% increase in year-over-year revenue at Mission Bay*. The first quarter of FY2021 year saw an increase of eight thousand (8,000) rounds of golf year over year. This was a 30% increase for the first quarter of FY2021 (July 1, 2020, was the start of the fiscal year). For the first quarter of FY2021 *Mission Bay generated \$983,000 in revenue* compared to \$632,800 in FY2020.

So, in conclusion, all of us at the SDMGC ask that you please recognize the importance of MBGC to the community and maintain the eighteen-hole course in its entirety. We urge that the city of San Diego's planning department recognize the actual societal, environmental, and recreational benefits that MBGC brings to our community; and how vital it is in providing affordable and accessible public golf and recreation for the citizens of San Diego. Please use your conscience in smart planning for all, listen to San Diego community of golfers, the SCGA, USGA, the PGA/LPGA tour, and protect Mission Bay Golf Course, as per the previous park administration's vision these last 66 years.

Very Truly Yours,

Kurt W. Carlson
Chair

The San Diego Municipal Golf Committee
Contact us at:
sdmunigolf@gmail.com

**CALIFORNIA STATE LANDS
COMMISSION**

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Established in 1938

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from Voice Phone **800.735.2929**
or for Spanish **800.855.3000**

Contact Phone: 916-574-0450

October 27, 2021

File Ref.: G10-07

Sent Via Electronic Mail

PAvila@sandiego.gov

Paola Avila, Chief of Staff
City of San Diego, Office of Mayor Todd Gloria
City Administration Building
202 C Street, 11th Floor
San Diego, CA 92101

Subject: Campland on the Bay and Mission Bay RV Resort Violations

Dear Ms. Avila,

The California State Lands Commission (Commission) is aware that two private resorts that lease public trust lands in Mission Bay from the City of San Diego, Campland on the Bay and Mission Bay RV Resort, have impeded and discouraged the public from accessing the City's legislatively granted public trust lands. The deterrents included fencing and other objects that restricted public access and public parking, and the placement of private property signs deterring the public from accessing the beach. The City's lease with Campland and Mission Bay RV Resort for the use of the public trust lands includes requirements to provide public access to the beach, bike and pedestrian paths, free access to a large public parking lot, and signs stating that specific areas are available for public access. It is staff's understanding that Campland on the Bay and Mission Bay RV Resort violated the City's lease requirements and public access policies in the Coastal Act, resulting in the California Coastal Commission assessing more than \$1 million in penalties for the two resorts.

As you know, the City is a trustee of legislatively granted public trust lands and is responsible for managing these lands in a manner that is consistent with the common law Public Trust Doctrine and the terms of its legislative grant. Lands

Paola Avila
October 27, 2021
Page 2

underlying Campland on the Bay and the Mission Bay RV Resort are part of the City's legislative trust grant and subject to the Public Trust. In its capacity as a trustee, the City is responsible for assuring that its lessees of trust lands are in compliance with their leases, including public access requirements. The City's leases with Campland on the Bay and Mission Bay RV Resort also require that the lessees observe all laws, including laws passed after the lease went into effect, which includes the Coastal Act.

The Commission has residual oversight authority over the City's granted public trust lands. As such, Commission staff would like to take this opportunity to remind the City that it is responsible for ensuring that the public trust lands it manages are consistent with the Public Trust Doctrine and the City's legislative grant. Public access is foundational to the Public Trust Doctrine. Safeguarding and promoting access to California's public tidelands is one of the State Lands Commission's core responsibilities. While Commission staff is dismayed about the public access violations and understands that the operator, not the City, breached the lease, it is incumbent on the City to ensure that its lessees comply with the legislative grant and the Public Trust Doctrine.

Commission staff is pleased that the operator has taken steps to remedy the public access violations. Commission staff requests that the City be vigilant in ensuring that Campland on the Bay and Mission Bay RV resort come back into compliance with their lease and the Coastal Act, and that public access is restored. Commission staff also requests that the City keep the Commission apprised as the situation evolves.

Please do not hesitate to contact me at (916) 574-0450 or Reid.boggiano@slc.ca.gov if you would like to discuss this issue further or if the State Lands Commission can provide any additional information.

Sincerely,



Reid Boggiano
Granted Lands Program Manager