

# FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

Project No. 562189  
SCH No. 2017051034

**SUBJECT: MISSION BAY PARK MASTER PLAN – FIESTA ISLAND AMENDMENT**

**APPLICANT:** City of San Diego Planning Department

**FINAL DOCUMENT – MARCH 28, 2019:**

In response to comments received during public review, minor revisions and clarifications have been made to the document which do not change the conclusions of the Draft Program Environmental Impact Report (PEIR) regarding the project's potential environmental impacts and required mitigation. As defined in CEQA Section 15088.5, minor revisions and clarifications to the document – which are shown in ~~strikeout~~/underline format in Chapter 3, Revisions to the Draft PEIR in the Final PEIR – do not represent “significant new information” and therefore, recirculation of the Draft PEIR is not warranted. No new significant environmental impacts would occur from these modifications, and similarly, no substantial increase in the severity of environmental impacts would occur.

## **PROJECT LOCATION:**

Fiesta Island is located in the eastern half of Mission Bay Park. To the east of Fiesta Island is Interstate 5 (I-5) and the railroad tracks. Just north of the Fiesta Island Road causeway is a small cove and the outfall of Tecolote Creek into Mission Bay. Further north, to the east of Fiesta Island, across the water, East Mission Bay Drive runs north-south and is adjacent and parallel to I-5. To the southwest and south of Fiesta Island is SeaWorld San Diego and the Hubbs-SeaWorld Research Institute. To the south and southeast of Fiesta Island is South Shores Park.

Fiesta Island includes approximately 470 acres and 6 miles of shoreline. Fiesta Island is connected to the mainland only by the Fiesta Island Road causeway which intersects East Mission Bay Drive. Sea World Drive is the primary thoroughfare that provides access to East Mission Bay Drive, I-5 to the east, and the beach communities to the west.

## **PROJECT DESCRIPTION:**

The proposed project is an amendment to the Mission Bay Park Master Plan (Master Plan) to update the land uses and vision for Fiesta Island. The proposed project includes maps, diagrams, and supporting policy recommendations in the Master Plan that will guide future improvements to the approximately 470-acre planning area in four subareas. The proposed project includes two options, Option A and Option B, with different elements in one of the four subareas, the Southwest Subarea.

The project includes recommendations for Island-wide improvements to recreation facilities, access and circulation, changes to parking, construction of soft-surface trails and paved multi-use paths linking different areas together, grading and landscaping, habitat improvements, water quality improvements, eelgrass bed plantings, enhancements to directional signs, and utilities upgrades.

Proposed roadway improvements include the realignment of Fiesta Island Road between the North Subarea and the Central Subarea, and a realignment in the Southeast Subarea; new crossover roadways between the North Subarea and the Central Subarea, and between the Central Subarea and the Southeastern Subarea; new roadway segments in the interior of Fiesta Island; a change in the one-way travel direction on Fiesta Island Road from counterclockwise to clockwise; a widening of the causeway onto Fiesta Island; the construction of a roundabout at the entrance to Fiesta Island; and enhancement of the existing roadway.

Fiesta Island improvements are discussed within four subareas:

**North Subarea:** The North Subarea would remain preserved habitat and a habitat buffer area with recreation limited to use of the perimeter roadway and permitted beach areas for swimming, fishing, and parking. Along the northern side of the crossover roadway there would be a small area for nature viewing and wildlife observation. The existing least tern nesting site, berm, and fencing surrounding it would remain. A wetland habitat area would be expanded adjacent to the least tern nesting site. Dredging is planned to occur on both the western and eastern side of the island to support new wetland habitat and improve water circulation by creating a channel that cuts through the Island.

**Central Subarea:** Planned improvements in the Central Subarea include relocating the existing sand management area (currently in the Southeast Subarea). The unimproved land surrounding the sand management area would be enhanced through the creation of a habitat preserve, sand dune habitat, and native vegetation plantings. No changes are planned to the existing San Diego Youth Aquatic Center and the Fiesta Island Youth Camp, except an existing habitat area is identified within the northern portion of the lease area. Creation of new berms is planned to provide wind protection and arena seating as part of the sand recreation area. The sand arena used for recreational events is also identified as a location for an emergency large animal shelter. New sand volleyball courts and other sand-oriented recreation facilities would be created in the expanded sand recreation area.

**Southeast Subarea:** Planned improvements to the Southeast Subarea include two active recreation parks, plazas and public restrooms, a group day use and primitive camp area, public parking areas, playgrounds, public art, ADA shore access at Enchanted Cove and Hidden Anchorage, an expanded fenced habitat, and wetland restoration. Creation of large habitat preserve is planned to the west of the realigned Fiesta Island Road and north of the southern shore of the Southeast Subarea. Wetland restoration would occur in the water near the outfall of Tecolote Creek, on the north side of the causeway, and would include a portion of the beach on the Island. The remaining land area would be revegetated with coastal landscape habitat allowing for passive recreation uses, trails, and the multi-use path.

**Southwest Subarea – Option A:** Option A for the Southwest Subarea includes a fenced off-leash dog park and shoreline park. New developed facilities are also planned as part of the dog park, including a small dog fenced off-leash area, a dog special event area, a special event obstacle course, and a canine competition staging area. Other facilities for the dog park would be created as part of the improvements, such as a series of fences and double-gates to

help contain off-leash dogs. A new parking lot would also be constructed as part of the developed dog park facilities. Recreational trails would be enhanced throughout the fenced off-leash dog area.

A new roadway that extends south to a public parking area with trailer spaces would provide access to a non-motorized boat storage, nearby beach watercraft storage areas, and shore launching area for non-motorized watercrafts. Adjacent to the boat storage, a plaza, a playground, a lifeguard tower, and public restrooms would all be located next to a supervised swimming beach along with ADA shore access as well as a pier, ramp, and floating dock. The existing Stony Point least tern nesting site would remain, as would the existing seasonal closure fencing and buffer. Eelgrass restoration is planned off the southeast shore of Stony Point.

Southwest Subarea – Option B: Option B for the Southwest Subarea includes a fenced off-leash dog park and shoreline park. New developed facilities would include a proposed small dog fenced off-leash area. Other facilities for the dog park would be created as part of the improvements, such as a series of fences and double-gates to help contain off-leash dogs. Recreational trails would be enhanced throughout the fenced off-leash dog area. A view pavilion, plaza, and seating are also proposed as part of the trail improvements. Two new parking lots would also be constructed, one near the new developed dog park facility and one near Hidden Anchorage Bay adjacent to Fiesta Island Road. The existing Stony Point least tern nesting site would remain, as would the existing seasonal closure fencing and buffer. Eelgrass restoration is also planned off the southeast shore of Stony Point.

The Mission Bay Park Master Plan - Fiesta Island Amendment is available on the Planning Department's website at:

<http://fiestaislandamendment.com/>

#### **ENVIRONMENTAL DETERMINATION:**

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

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

Based on the analysis conducted for the project described above, the City of San Diego has prepared a Draft Program Environmental Impact Report (PEIR) in accordance with the California Environmental Quality Act (CEQA). The analysis conducted identified that the Fiesta Island Amendment could result in significant and unavoidable impacts related to **Transportation/Circulation (Vehicular Traffic Circulation)**, and less than significant impacts with implementation of mitigation measures related to **Biological Resources (Sensitive Species, Sensitive Habitats, Wetlands, Migratory Corridors, Conservation Planning [Environmental Plans], and Edge Effects)**. All other impacts analyzed in the Draft PEIR would be less than significant.

**PUBLIC REVIEW DISTRIBUTION:**

The following agencies, organizations, and individuals received a copy or notice of the Draft PEIR and were invited to comment on its accuracy and sufficiency. Copies of the Draft PEIR and any technical appendices may be reviewed at the Planning Department, located at 9485 Aero Drive, San Diego, CA 92123, or purchased for the cost of reproduction.

**FEDERAL GOVERNMENT**

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

**STATE OF CALIFORNIA**

Caltrans, District 11 (31)  
California Department of Fish & Wildlife (32)  
Department of Toxic Substance Control (39)  
California Regional Water Quality Control Board (44)  
State Clearinghouse (46A)  
California Coastal Commission (47)  
California Air Resources Board (49)  
California Transportation Commission (51)  
California Department of Transportation (51A)  
California Department of Transportation (51B)  
Native American Heritage Commission (56)  
State Lands Commission

**COUNTY OF SAN DIEGO**

Air Pollution Control District (65)  
County of San Diego Department of Planning and Land Use (68)  
County Water Authority (73)

**CITY OF SAN DIEGO**

Office of the Mayor (91)  
Council President Montgomery, District 4  
Council President Pro Tem Bry, District 1  
Councilmember Campbell, District 2  
Councilmember Ward, District 3  
Councilmember Kersey, District 5  
Councilmember Cate, District 6  
Councilmember Sherman, District 7  
Councilmember Moreno, District 8  
Councilmember Gómez, District 9

Office of the City Attorney

Corinne Neuffer, Deputy City Attorney

Planning Department

Mike Hansen, Director  
Tom Tomlinson, Assistant Director  
Alyssa Muto, Deputy Director

Laura Black, Deputy Director  
Heidi VonBlum, Program Manager  
Sara Osborn, Senior Planner and Project Manager  
Rebecca Malone, Senior Planner  
Elena Pascual, Assistant Planner  
Jordan Moore, Assistant Planner  
Samir Hajjiri, Senior Traffic Engineer  
Christine Mercado, Associate Traffic Engineer  
Myra Herrmann, Senior Planner  
Susan Morrison, Associate Planner  
Betsey Miller, Development Project Manager III  
Holly Smit-Kicklighter, Associate Planner – MSCP

Development Services Department

Peter Kann, Development Project Manager I  
Mehdi Rastakhiz, Associate Engineer – Civil  
James Quinn, Senior Engineer Geologist  
Brian Panther, Solid Waste Inspector III – Local Enforcement  
Meghan Cedeño – Associate Traffic Engineer

Parks and Recreation Department

Andrew Field, Director  
Jeff Van Deerlin, Program Manager  
Stacy McKenzie, District Manager

Environmental Services Department

Lisa Wood, Program Manager

Fire-Rescue Department

Larry Trame, Assistant Fire Marshal  
Fire and Life Safety Services (79)  
San Diego Fire – Rescue Department Logistics (80)

Police Department

Jason Zdunich, Police Officer II

Transportation & Storm Water Department

Victoria Kalkirtz, Senior Planner  
Mark Stephens, Associate Planner

Public Works Department

Sean Paver, Senior Planner

Real Estate Assets Department

Cybele Thompson, Director

Economic Development Department

Cody Hooven, Director  
Tanner French – Senior Traffic Engineer

Libraries

Central Library (81A)

Clairemont Branch Library (81H)  
Pacific Beach Taylor Branch Library (81X)

City Advisory Boards or Committees

Wetlands Advisory Board (91A)

**Other City Governments**

San Diego Association of Governments (108)  
Metropolitan Transit System (112/115)  
San Diego Gas & Electric (114)

**School Districts**

San Diego Unified School District (132)

**Other Agencies, Organizations and Individuals**

San Diego Association of Governments (108)  
Metropolitan Transit System (112)  
San Diego Gas & Electric (114)  
Metropolitan Transit System (115)  
The San Diego River Park Foundation (163)  
Sierra Club (165)  
San Diego Natural History Museum (166)  
San Diego Audubon Society (167)  
Mr. Jim Peugh (167A)  
California Native Plant Society (170)  
Endangered Habitats League (182)  
Endangered Habitats League (182A)  
San Diego River Conservancy (168)  
Citizens Coordinate for Century 3 (179)  
Carmen Lucas (206)  
South Coast Information Center (210)  
San Diego Archaeological Center (212)  
Save Our Heritage Organisation (214)  
Clint Linton (215B)  
Frank Brown, Inter-Tribal Cultural Resources Council (216)  
Campo Band of Mission Indians (217)  
San Diego Archaeological Society Inc. (218)  
Kuumeyaay Cultural Heritage Preservation (223)  
Kuumeyaay Cultural Repatriation Committee (225)  
Native American Distribution (225A-S)  
Clairemont Mesa Planning Committee (248)  
Clairemont Town Council (257)  
Linda Vista Community Planning Group (267)  
Pacific Beach Community Planning Committee (375)  
Mission Bay Park Committee  
    P. Robinson  
    K. Konopasek  
    D. Potter  
    C. Hedgecock  
    D. Walter  
    G. Ingolia  
    W. Earley

R. Anderson  
J. Greene  
Fiesta Island Dog Owners (FIDO)

**RESULTS OF PUBLIC REVIEW:**

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



Alyssa Muto, Deputy Director  
Planning Department

December 7, 2018  
Date of Draft Report

March 28, 2019  
Date of Final Report

Analyst: Rebecca Malone, AICP

March 2019 | Final Program Environmental Impact Report  
State Clearinghouse No. 2017051034

# MISSION BAY PARK MASTER PLAN – FIESTA ISLAND AMENDMENT PEIR

for City of San Diego

*Prepared for:*

**City of San Diego**

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San Diego, California 92123  
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*Prepared by:*

**PlaceWorks**

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# 1. Introduction

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## 1.1 INTRODUCTION

This Final Program Environmental Impact Report (PEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code §§ 21000 et seq.) and CEQA Guidelines (California Code of Regulations §§ 15000 et seq.).

According to the CEQA Guidelines, Section 15132, the Final PEIR shall consist of:

- (a) The Draft Program Environmental Impact Report or a revision of the Draft;
- (b) Comments and recommendations received on the Draft PEIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies comments on the Draft PEIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

This document contains responses to comments received on the Draft PEIR for the Mission Bay Park Master Plan – Fiesta Island Amendment Draft PEIR during the public review period, which began December 7, 2018, and closed January 21, 2019. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This document and the circulated Draft PEIR comprise the Final PEIR, in accordance with CEQA Guidelines, Section 15132.

## 1.2 FORMAT OF THE FEIR

This document is organized as follows:

**Chapter 1, Introduction.** This chapter describes CEQA requirements and content of this Final PEIR.

**Chapter 2, Response to Comments.** This chapter provides a list of agencies and interested persons commenting on the Draft PEIR; copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a letter (A-AZ, B-BI, C-Z). Individual comments have been lettered within each comment letter and is followed by responses with references to the corresponding comment number.

**Chapter 3. Revisions to the Draft PEIR.** This chapter contains revisions to the Draft PEIR text and figures as a result of the comments received by agencies and interested persons as described in Section 2, and/or errors and omissions discovered subsequent to release of the Draft PEIR for public review.

## 1. Introduction

The responses to comments contain material and revisions that will be added to the text of the Final PEIR. City of San Diego staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the Draft PEIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the Draft PEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

### 1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of Draft PEIRs should be “on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

CEQA Guidelines Section 15204 (c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this Final PEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on Draft PEIRs.

## 2. Response to Comments

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Section 15088 of the CEQA Guidelines requires the Lead Agency (City of San Diego) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the Draft PEIR and prepare written responses.

This chapter provides all written responses received on the Draft PEIR and the City of San Diego's responses to each comment.

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the Draft PEIR are excerpted in this document, the sections are shown indented. Changes to the Draft PEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons that submitted comments on the Draft PEIR during the public review period.

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
A	State Clearinghouse and Planning Unit	January 23, 2019	2-5
AA	Kathy Archibald	January 11, 2019	2-9
AB	Kimberly Bond	January 13, 2019	2-13
AC	Nik Hawks	January 13, 2019	2-17
AD	Ryan Llewellyn	January 14, 2019	2-21
AE	JK Yamo	January 14, 2019	2-25
AF	Katy Bendel Daniels	January 14, 2019	2-29
AG	Chad Nelson	January 15, 2019	2-33
AH	Spencer Martin	January 16, 2019	2-37
AI	Chris Hjerling	January 16, 2019	2-41
AJ	Jim Bloom	January 16, 2019	2-45
AK	Bonnie Nickel	January 16, 2019	2-49
AL	Caltrans	January 17, 2019	2-53
AM	Susan Walter	January 17, 2019	2-57
AN	Susan Lathe	January 18, 2019	2-61
AO	Walt Spencer	January 18, 2019	2-65
AP	Kathy Parrish	January 20, 2019	2-69
AQ	Judie Lincer	January 20, 2019	2-75
AR	Debra Madden	January 20, 2019	2-79
AS	Jean Spengel	January 20, 2019	2-83
AT	James Gonzales	January 20, 2019	2-93
AU	Franklin Howard	January 20, 2019	2-97
AV	Christine Harris	January 21, 2019	2-101
AW	Carolyn Chase	January 21, 2019	2-105

## 2. Response to Comments

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
AX	Gary Cannon	January 20, 2019	2-115
AY	San Diego Chapter CNPSSD and San Diego Audubon Society	January 21, 2019	2-125
AZ	Nancy Seelert	January 21, 2019	2-137
B	Peter Holmes	December 7, 2018	2-141
BA	Karen Riggs-Saberton	January 21, 2019	2-145
BB	Christine Thomas	January 21, 2019	2-161
BC	Susan Juhl	January 21, 2019	2-165
BD	Ben Nicholls	January 21, 2019	2-169
BE	DeLano and DeLano (on behalf of FIDO)	January 22, 2019	2-173
BF	Brian Bender	January 22, 2019	2-187
BG	Don Gross	January 21, 2019	2-191
BH	CDFW	January 25, 2019	2-197
BI	San Diego County Archaeological Society, Inc.	January 20, 2019	2-205
C	Erin Sweeney	December 7, 2018	2-209
D	Rick Kamen	December 7, 2018	2-213
E	Karen Tremain	December 7, 2018	2-217
F	Ed Lima	December 8, 2018	2-221
G	Carrie Kirtz	December 10, 2018	2-225
H	Lauren Kahal	December 10, 2018	2-231
I	Melissa Chavarro	December 10, 2018	2-235
J	Chelsea Gastelum	December 10, 2018	2-239
K	Ashley Whittke	December 10, 2018	2-243
L	Sarah Gerhard	December 10, 2018	2-247
M	Susanne Slater	December 17, 2018	2-251
N	Viejas Tribe	December 19, 2018	2-255
O	Dave Thompson	December 22, 2018	2-259
P	Carolyn McClain	January 2, 2019	2-263
Q	Mike Dicerbo	January 3, 2019	2-267
R	Sarah Shreves	January 3, 2019	2-271
S	Annemarie Keating	January 3, 2019	2-275
T	Ashley Berg	January 4, 2019	2-279
U	Cheance Adair	January 8, 2019	2-283
V	Michael Candra	January 8, 2019	2-287
W	Faye Sherman	January 9, 2019	2-141
X	Clifford Weiler	January 11, 2019	2-295
Y	Denise Meisner	January 11, 2019	2-299
Z	No Name	Not Dated	2-303

## 2. Response to Comments

### 2.1 MASTER RESPONSE FOR PROGRAM EIR

The proposed project would modify the current parks plan to match either the plan recommended for action by the Mission Bay Parks Committee in 2002 shown as Plan A, or the modified version of Plan A that has a larger fenced off-leash dog park shown as Plan B in the PEIR. Both the existing Fiesta Island Plan and the proposed project, retain the park as public open space. The modified plans are considered conceptual, and in the case of Plan A, developed after considerable public outreach between community groups; a statistically valid random telephone survey of over 800 households; two public workshops; regularly scheduled and advertised public meetings with the Mission Bay Planners (an advisory group sanctioned by City Council which included the Mission Bay Park Committee); and regular meetings with a steering committee composed of directors and management staff from key City of San Diego Departments.

Fiesta Island is man-made, largely from dredging operations used to create Mission Bay. As explained in Section 5.2 Biological Resources, much of the flora and fauna on the island are non-native species and in some instances considered invasive. With the exception of the youth camp area, there has been no formalized planting on the island. As explained in Section 5.2 Biological Resources, prior to any ground disturbance a number of project-specific technical studies are required. Mitigation Measures BIO-1 through BIO-6 address surveys for sensitive habitat, least tern, avian species, and marine mammals. Because of the nature of biological resources, it is essential that these surveys occur as close to the time of construction as possible. As stated on Page 5.2-3 of the PEIR, and in every mitigation measure, detailed surveys will be required prior to any ground disturbance. The mitigation measures in the PEIR, coupled with the City's Land Development Code, will ensure that detailed biological analysis will occur during the appropriate time and prior to any construction. As mitigation measures, they will be included in the Mitigation Monitoring and Reporting Program (MMRP) establishing the City's commitment to completing the measures prior to construction. The MMRP also provides public information on the implementation of each measure.

At this time there are no detailed construction documents, funding mechanisms, or engineering studies for any future improvements that would be needed to inform a detailed technical review of biological resources on the island. The regulatory process is such that it is likely that future improvements will actively attempt to avoid wetlands, and/or impact of sensitive species. Fortunately, the island is large enough, and has sufficiently diverse habitat as shown in Section 5.2 Biological Resources, that adjustments in future improvements can be made to avoid sensitive habitats.

Mitigation measures are developed consistent with project impacts and best management practices. As both the timing, location, and design of future improvements is unknown, the detail of how mitigation will occur is also unknown. These details will be determined at the time of project-level CEQA analysis and with mitigation strategies developed with applicable federal, state, and local agencies as more future project details are developed.

Section 15146 of the CEQA Guidelines allows for the degree of specificity found in the PEIR when detailed project information is not known. As it is possible that several years will elapse before some of the future improvements are made, mitigation is needed to ensure that any future work would conduct new biological

## 2. Response to Comments

studies. Section 15152(c) of the CEQA Guidelines allows for tiering of project-level documents from a conceptual document such as the PEIR.

### **15152. TIERING**

(a) “Tiering” refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.

(b) Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including general plans, zoning changes, and development projects. This approach can eliminate repetitive discussions of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy, or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration. Tiering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration. However, the level of detail contained in a first tier EIR need not be greater than that of the program, plan, policy, or ordinance being analyzed.

(c) Where a lead agency is using the tiering process in connection with an EIR for a large-scale planning approval, such as a general plan or component thereof (e.g., an area plan or community plan), the development of detailed, site-specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of a more limited geographical scale, as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand.

As required by CEQA, the PEIR evaluated environmental impacts with sufficient detail to identify the potential for future impact, and establish appropriate mitigation measures. The City’s development review process, land development code, and applicable state, federal, and local regulations, will ensure that future environmental review will occur.

## 2. Response to Comments

LETTER A – State Clearinghouse and Planning Unit (2 pages)

 Gavin Newsom Governor	<p>STATE OF CALIFORNIA Governor's Office of Planning and Research State Clearinghouse and Planning Unit</p>	 Kate Gordon Director
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January 23, 2019

Rebecca Malone  
City of San Diego  
9485 Aero Dr  
San Diego, CA 92123

Subject: Mission Bay Park Master Plan Update - Fiesta Island Amendment  
SCH#: 2017051034

Dear Rebecca Malone:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 22, 2019, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,  
  
Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044  
TEL 1-916-445-0613 state.clearinghouse@opr.ca.gov www.opr.ca.gov

## 2. Response to Comments

### Document Details Report State Clearinghouse Data Base

**SCH#** 2017051034  
**Project Title** Mission Bay Park Master Plan Update - Fiesta Island Amendment  
**Lead Agency** San Diego, City of

**Type** EIR Draft EIR

**Description** The proposed project is an amendment to the Mission Bay Park Master Plan to update the land uses and vision for Fiesta Island. The proposed project includes maps, diagrams, and supporting policy recommendations in the Master Plan that will guide future improvements to the approx 470-acre planning area in four subareas. The proposed project includes two options, Option A and Option B, with different elements in one of the four subareas, the Southwest Subarea.

#### Lead Agency Contact

**Name** Rebecca Malone  
**Agency** City of San Diego  
**Phone** (619) 446-5371  
**email**  
**Address** 9485 Aero Dr  
**City** San Diego  
**Fax**  
**State** CA **Zip** 92123

#### Project Location

**County** San Diego  
**City** San Diego  
**Region**  
**Lat / Long** 31° 11" N / 117° 21' 54" W  
**Cross Streets** East Mission Bay Dr/Fiesta Island Rd  
**Parcel No.** 4354801700  
**Township** **Range** **Section** **Base**

#### Proximity to:

**Highways** I-5, I-8, SR 209  
**Airports** S  
**Railways** ATSF, Amtrack, Coaster, SD Trol  
**Waterways** Tecolote Creek, Mission Bay, San Diego River, Rose Creek, Pacific Ocean  
**Schools** SDUSD  
**Land Use** various

**Project Issues** Aesthetic/Visual; Air Quality; Biological Resources; Coastal Zone; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Soil Erosion/Compaction/Grading; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Other Issues

**Reviewing Agencies** Resources Agency; Department of Boating and Waterways; California Coastal Commission; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 11; Native American Heritage Commission; State Lands Commission; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 9

**Date Received** 12/07/2018 **Start of Review** 12/07/2018 **End of Review** 01/22/2019

Note: Blanks in data fields result from insufficient information provided by lead agency.

A-2

## 2. Response to Comments

### A. **Response to Comments from State Clearinghouse and Planning Unit, dated January 23, 2019.**

- A-1        The comment does not address the adequacy of the PEIR as it relates to CEQA. The City appreciates the comment letter from the State Clearinghouse.
  
- A-2        The comment does not address the adequacy of the PEIR as it relates to CEQA. The City appreciates the comment letter from the State Clearinghouse.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AA – Kathy Archibald (1 page)

**From:** Kathy Archibald  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** PROJECT NAME: Mission Bay Park Master Plan – Fiesta Island Amendment PROJECT No.: 562189 / SCH No. 2017051034  
**Date:** Friday, January 11, 2019 10:00:04 PM

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Hello!

AA-1 | I'd like to voice my support for Plan A! Or at least a plan that includes an appropriate and safe area to launch outrigger canoes (with parking, beach and restroom, near the ocean, not in the way of jet skis and motorized boats, etc).

AA-2 | I am a member of San Diego Outrigger Canoe Club and there are many of us paddlers who frequently use the bay to train and play on non-motorized watercraft and it is increasingly difficult to find safe and appropriate launch spots. Which is ironic and sad, because Mission Bay was intended for public recreation, and paddling is an extremely low impact sport. No motors means no fuel, noise, hazards to birds and sea life. And it is a healthy and fun sport which makes us appreciate and want to preserve the natural beauty of San Diego and life on the bay.

I am all for dogs and dog parks but I hope we can either co-exist on fiesta island or create an even better area designed for the numerous non-motorized watercraft (outriggers, kayaks, SUP, prone boards, surf skis, etc) that utilize the bay but seem to get squeezed out at every turn.

Thank you!  
Kathy Archibald

Member, San Diego Outrigger Canoe Club  
Pacific Beach resident

## 2. Response to Comments

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## 2. Response to Comments

### **AA. Response to Comments from Kathy Archibald, dated January 11, 2019.**

- AA-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AA-2 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AB – Kimberly Bond (1 page)

**From:** Kimberly Bond  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** Fiesta Island Plan A  
**Date:** Sunday, January 13, 2019 6:56:20 AM

Planning Department

AB-1 I am writing in regards to the two plans that have been submitted for development on Fiesta Island. I am an avid paddler who also is a dog owner. My dog goes to Fiesta Island about 5 times per week. He loves it I love it and I am very happy we will still be able to go there. On the other hand my passion and sport that is loved by so many people on Mission Bay are losing more and more space to access for launching of our great sport outrigger canoeing. I have been an outrigger paddler for 20 years and I paddle for San Diego Outrigger Club. We have been around since the 80's but our site is at Campland and we are almost 4 miles from the open ocean. This is really far when you consider the open ocean is where we race and compete so we need to train there. Unfortunately, we will be losing our site due to the De Anza project plans. We have over a 100 members in our club. Also due to the De anza project Ikuna Koa another canoe club will will be losing their site as well.

AB-2 We need a site to store and access our canoes these are no ordinary canoes they are 400 lbs and approximately 40 feet long. The Fiesta Island plan A gives paddlers the opportunity to have a permanent home without the fear of not be able to access the bay and ocean. Mission Bay is an amazing body of water that should be able to be utilized by manpowered water craft. We are asking for a small portion of Fiesta Island to be able to store and launch our canoes. The site that is in Plan A gives us this opportunity. The Fido group doesn't want to share space because they want to have full reign of that area. They will still enjoy 85 acres of leash free area for their dogs this is an amazing amount of space. We are asking for only 7 acres to store our equipment so we can have access to Mission Bay in an area that is safe from the high speed motor boat and jet ski areas and that allows us better access to the ocean. The Fido group wants us somewhere else where they suggest will be over 6 miles to the ocean that is

AB-3 uncomprehensible. Please I am pleading with you to allow us to be able to share this small portion of fiesta Island with the dog owners. Mission bays access to watersports is slowly dwindling and having this access is crucial for the existence of our wonderful sport. Please consider Plan A this would give each group the opportunity to continue to be able to do what they love.

Thank you,

Kimberly Pennington SDOCC Womens Coach

[Sent from Yahoo Mail on Android](#)

## 2. Response to Comments

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## 2. Response to Comments

**AB. Response to Comments Kimberly Bond, dated January 13, 2019.**

- AB-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AB-2 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AB-3 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AC– Nik Hawks (1 page)

**From:** Nik Hawks  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** Mission Bay Park Master Plan Fiesta Island Amendment, 562189  
**Date:** Sunday, January 13, 2019 10:35:14 AM

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- AC-1 | Ms Malone,  
I'd like make known my support for Option B as the alternative with the lowest environmental impacts and the lowest cost, both extremely important to San Diego citizens.
- AC-2 | Please analyze other locations in Mission Bay Park, including but not limited to Fiesta Island outside the fenced area, South Shores, and Mariner's Point for paddling group storage and facilities.  
South Shores & Mariner's Point rated higher for having more of the items paddlers want, based on a letter submitted by the paddlers themselves to the City.
- AC-3 | The continuous perimeter path and access to the shoreline are vital aspects that need to be respected.
- AC-4 | Could you answer why there isn't an option C to resolve the conflict between all users who deserve a place?  
Thanks for your time, I appreciate your service and examination of this issue.

Regards,  
Nik Hawks  
San Diego Citizen

## 2. Response to Comments

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## 2. Response to Comments

### AC. Response to Comments from Nik Hawks dated January 13, 2019.

- AC-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AC-2 The comment does not address the adequacy of the PEIR as it relates to CEQA. Alternative storage and facilities locations are not a component of the proposed project.
- AC-3 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AC-4 Project alternatives were analyzed in Chapter 9, *Alternatives to the Proposed Project*, of the PEIR. The Council is open to select either Option A or Option B, or another option at the time the project is considered.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AD – Ryan Llewellyn (1 page)

**From:** Ryan Llewellyn  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** PROJECT NAME: Mission Bay Park Master Plan – Fiesta Island Amendment PROJECT No.: 562189 / SCH No. 2017051034  
**Date:** Monday, January 14, 2019 12:07:59 PM  
**Attachments:** [Hera.pnq](#)

---

Good morning,

- AD-1 | I am writing in regards to the updated master plan to further develop Mission Bay Park - Fiesta Island. I am strongly opposed to further development of the island. Fiesta Island is beautiful and unique in that it offers residents the opportunity to enjoy a largely undeveloped habitat within the increasingly urbanite environment of San Diego. The undeveloped portions of the island are especially meaningful for dog owners. My dog does not play well with other dogs, so having a portion of the island outside of the "fenced-in dog park" area is important for
- AD-2 | me and others to allow their dogs to enjoy a big stretch of land off-leash. I believe that adding more "park" areas to the island would set a bad precedent for further development, leading to increasingly smaller sections of the island that are available for off-leash hiking.
- AD-3 | While I do not support any further development of Fiesta Island, I would support option B over option A for the proposal.

Thank you for your consideration,  
Ryan Llewellyn

## 2. Response to Comments

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## 2. Response to Comments

**AD. Response to Comments from Ryan Llewellyn, dated January 14, 2019.**

- AD-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AD-2 It is assumed that the commenter is referring to “Active Recreation” area when referring to “park” areas. It is not clear why the commenter believes that adding additional Active Recreation areas would set a precedent for future development of Fiesta Island. See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AD-3 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AE – JK Yamo (1 page)

**From:** yamo  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** Mission Bay Park Master Plan – Fiesta Island Amendment: PROJECT No.: 562189 / SCH No. 2017051034  
**Date:** Monday, January 14, 2019 1:15:31 PM

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PROJECT NAME: Mission Bay Park Master Plan – Fiesta Island Amendment  
PROJECT No.: 562189 / SCH No. 2017051034  
COMMUNITY AREA: Mission Bay Park

AE-1 | I support Plan "A"  
One can have a dog area in any vicinity. One cannot launch human powered water craft unless there is a launch area on the water. Common sense should prevail.

## 2. Response to Comments

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## 2. Response to Comments

### **AE. Response to Comments from JK Yamo, dated January 14, 2019.**

AE-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AF – Katy Bendel Daniels (2 pages)

**From:** Katy Bendel Daniels  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** Option B for Mission Bay Planning  
**Date:** Monday, January 14, 2019 3:51:40 PM  
**Attachments:** [image019.png](#)  
[image023.png](#)  
[image027.png](#)

Dear Planning CEQA,

AF-1 With regards to MPBC Option B, I do support them backing this option. I'm an avid user of the dog area, and I support the paddlers in their joy of using the bay and ocean. However, those with lifestyles who enjoy paddling do have far more options to have access and events to beach areas and water throughout the San Diego beaches and Mission Bay, than those with lifestyles that enjoy off leash exercise with their dog ... I've even seen pot belly pigs out there with families and their pet dogs ... they need off leash exercise too. The Fiesta Island Off-Leash area is a real gem for the city and promoting healthy living.

**My questions are:**

AF-2 If the paddle groups who already use the Boy Scout's beach access for free, but are wanting to move to the fenced dog use area, they would require a road that bisects the area and a new beach with the following challenges:

- Beach area is in a tidal zone,
- with an embankment that encases waste that was capped with 3 feet of soil that is not to be penetrated in fear it contaminates the Bay,
- and the embankment is 10 feet to 15 feet plus higher than the tidal zone

Questions -

AF-3

1. Is this a good use of city money? Seems that we have bigger issues within San Diego.
2. With that kind of height difference between the embankment encasing waste and the tidal zone, how far back would the grating have to start to taper the beach down to the tidal zone?
3. With that kind of height difference can it be graded accordingly without penetrating the encased waste?

AF-4

4. Is it a 'good/smart idea' to build a beach in a tidal zone and remove the current embankment that holds the water back during high tide?
  - a. If grading would ever be done in this area, I would request that adequate soil testing via core sampling be done prior to grading to ensure that there are not heavy metals and other toxins still contained in the underlying soil.

AF-5

5. Since most of the infrastructure needed by the paddlers is already located at the South Shores (bathrooms, large boat parking spaces, boat ramp and beach area, etc.), so why duplicate it again on Fiesta Island? If South Shores is used for the paddlers then it would stop a conflict between paddlers and dog owners and everyone would win.

## 2. Response to Comments

AF-5  
cont'd

Appreciate your time and efforts to look into and respond to these concerns.

Respectfully,

Katy



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Independent Contractor for  
Protravel International, a  
Virtuoso Member



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ADVENTURE  
TRAVEL

**Katy Bendel Daniels**

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## 2. Response to Comments

### AF. Response to Comments from Katy Bendel Daniels, dated January 14, 2019.

- AF-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AF-2 The commenter is correct that the beach area is in a tidal zone. Final design, including grading of the project area, has yet to be determined. State, federal, and local construction regulations would require the retention and/or treatment of storm water through the implementation of Best Management Practices (BMPs). Additionally, as described in Impact 5.2-6, in Section 5.2, *Biological Resources*, as part of the City’s MS4 requirements, developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials, and other elements that might degrade or harm the natural environment or ecosystems processes.
- AF-3
1. The comment does not address the adequacy of the PEIR as it relates to CEQA.
  2. See response to AF-2, above.
  3. See response to AF-2, above.
- AF-4 See response to AF-2, above.
- AF-5 The commenter is referring to Option A. The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

### LETTER AG – Chad Nelson (1 page)

**From:** Chad Nelson  
**To:** [PLN PlanningCEQA](#)  
**Subject:** Mission Bay Park Master Plan – Fiesta Island Amendment 562189 / SCH No. 2017051034  
**Date:** Tuesday, January 15, 2019 11:26:08 AM

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Please consider Option B when developing the Southwest Subarea of Fiesta Island and the off lease dog park.

The off leashed dog park is an already well used opportunity for the San Diego community. To have nearly 2 miles of safe, fenced perimeter to walk, with about 1.25 miles of that being shoreline seems unprecedented in an urban area. Not only does the amount of space encourage a healthy amount of walking for San Diego residents, the space gives their dogs a place to really stretch their legs and stay engaged with all of the terrain to explore.

AG-1 I think San Diego would be best served by the enhancements of Option B rather than the additions proposed in Option A. A dog special events area and obstacle course are niche facilities that do not serve the dog park community as a whole. The small dog area may make some pet owners more comfortable, but does not allow them to take advantage of what makes the park unique, its size. People don't come to this park to stand in one spot and let their dog run around in a confined area, they come to take an off leash walk with their dog. Small dogs integrate well with larger dogs in the existing area already, and if a small dog owner needs to find a place away from other dogs because of certain sensitivities, there is so much space in the park that it isn't difficult to do. These features, though they aim to serve dog owners, ultimately chip away at what makes the Fiesta Island off leash dog park so special, its size and the freedom that comes with it.

AG-2 As for the proposed recreational facilities of Option A. I understand the location provides an opportunity for convenient access to areas of water that are suitable for non motorized boat access. But again, this really chips away from what makes this dog park so special, even going so far as to remove access to areas of the park that are trafficked by nearly every visitor at present.

AG-3 The dog park is used by so many of San Diego's dog owning residents, and with the enhancements proposed in Option B, (parking lots, recreation trail enhancements) the park will become even more desirable and attract further use without detracting from it in anyway. Please consider keeping the off lease dog park on Fiesta Island for the dogs.

- Chad Nelson

## 2. Response to Comments

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## 2. Response to Comments

**AG. Response to Comments from Chad Nelson, dated January 15, 2019.**

- AG-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AG-2 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AG-3 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AH – Spencer Martin (1 page)

From: Spencer Martin  
To: [PLN\\_PlanningCEQA](#)  
Subject: Mission Bay Park Master Plan – Fiesta Island Amendment 562189 / SCH No. 2017051034  
Date: Wednesday, January 16, 2019 7:44:11 AM

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AH-1 | Hello,  
I am writing to submit my comments for for the above referenced project. In the interest of preserving access to Mission Bay for non-motorized watercraft, I would like to propose the council select Southwest Subarea - Option A for this project.

Best,  
Spencer

--  
Spencer W. Martin

## 2. Response to Comments

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## 2. Response to Comments

### **AH. Response to Comments from Spencer Martin, dated January 16, 2019.**

AH-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

### LETTER AI – Chris Hjerling (1 page)

**From:** Chris Hjerling  
**To:** [PLN\\_Planning/CEQA](#)  
**Subject:** Mission Bay Park Master Plan – Fiesta Island Amendment, 562189 / SCH No. 2017051034  
**Date:** Wednesday, January 16, 2019 9:29:06 AM

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Dear Rebecca Malone, Environmental Planner,

I am writing this email to show my support for the Option A plan of the Fiesta Island development. To keep it as simple as possible, here are some reasons to follow through with Option A that make sense for **EVERYONE**.

AI-1 Option A isn't about taking away from the Dog owner's recreation. It is simply about sharing land for many recreational users. **The goal should be to find the best shared use, not make this a war of opposition like everything else in politics.** The dog park will still have an overwhelming share of the land use. We'd like to think that FIDO members would partake in the water sports and vice versa as many paddlers own dogs and believe in leash-free areas.

AI-2 The entire development to house the road, pavilion and boat areas only removes 6 acres from the total lease free areas. **FIDO will still have 87 acres of land** for their activities vs 93. We are talking about a 7-8% change only in order to create an environment for many other activities which depend on water access where as dog parks do not. Dog owners have the ability to propose leash-free areas anywhere in San Diego. Watersports do not. **We depend on coastlines and bays**, which are losing areas for the public each year. I am a dog owner. Most of the outrigger paddlers have dogs. **Nothing in Option A tries to eliminate the land use for dogs. It is just trying to share. Option B removes shared use** for water crafts.

AI-3 FIDO is discussing the "danger" of a road, but there is only a tiny piece of the beach that would require them to cross a very short road vs what is existing. They want it to sound like the road cuts through the middle of the area which is an exaggeration. Plus Dog owners can access the other side of the road without crossing if they simply walk the beach. It isn't disruptive or dangerous, and there is a fence.

AI-4 When discussing cost efficiency, not all of the development is for boats or water sports. There are many areas for more dog-related activities and special community events, like the competition dog staging area and the hillside amphitheatre. If budget is an issue, then remove the additional dog-based developments and just make boat access.

AI-5 Lastly, non-motorized sports do NOT hurt the environment. In fact, we are the people who pick up trash through the bays and beaches.

AI-6 **SAN DIEGO IS A BEACH CITY. The blood of this community is coastal living.** This goes beyond FIDO in terms of political and community issues. If our politicians continue to take away our access to the beach, the political impact will be much greater in years to come when deciding our officials.

*OPTION A is simply a better solution for everyone.*

Best,  
Chris Hjerling

## 2. Response to Comments

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## 2. Response to Comments

### **AI. Response to Comments from Chris Hjerling, dated January 16, 2019.**

- AI-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AI-2 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AI-3 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AI-4 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AI-5 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AI-6 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AJ – Jim Bloom (1 page)

**From:** Jim Bloom  
**To:** [PLN\\_PlanningCEOA](#)  
**Subject:** Mission Bay Park Master Plan – Fiesta Island Amendment PROJECT No.: 562189 / SCH No. 2017051034  
**Date:** Wednesday, January 16, 2019 12:56:48 PM

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AJ-1      Rebecca,  
I'm a member of San Diego Outrigger Canoe Club and our site for boat storage at Campland by the Bay is being returned to a natural habitat in a few years. Two canoe clubs, San Diego Outrigger Canoe Club and Ikuna Koa, are being heavily impacted. I'm in favor Option A, which allows for boat storage and free-leash area for dogs.  
I've been using Mission Bay facilities for over 15 years and have enjoyed amenities that it has to offer. Please give Option A a fair chance in your decision. We are not against the fenced-in dog area, we would just want a site to stow our canoes. San Diego Outrigger Canoe Club has been at Campland since 1985 and wish to remain in Mission Bay.  
Thank you,  
  
--  
Jim Bloom

## 2. Response to Comments

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## 2. Response to Comments

### **AJ. Response to Comments from Jim Bloom, dated January 16, 2019.**

AJ-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AK – Bonnie Nickel (2 pages)

**From:** Bonnie  
**To:** [PLN\\_Planning@CSD.org](mailto:PLN_Planning@CSD.org)  
**Cc:** [conservation@cnpsd.org](mailto:conservation@cnpsd.org)  
**Subject:** Fiesta Island Draft PEIR  
**Date:** Wednesday, January 16, 2019 10:02:14 PM  
**Attachments:** [image.png](#)

PROJECT NAME: Mission Bay Park Master Plan – Fiesta Island Amendment  
PROJECT No.: 562189 / SCH No. 2017051034  
COMMUNITY AREA: Mission Bay Park  
COUNCIL DISTRICT: 2 (Campbell)

To Whom It May Concern,

Thousands of the smallest butterfly in North America, the Western Pygmy-Blue (*Brephidium exilis*), were swarming the numerous Woolly Seablite (*Suaeda taxifolia*) shrubs that line the dirt road in the Southeast Subarea of Fiesta Island this past July and August 2018. It was a wondrous sight to see.



AK-1

This dirt road lined with those wild native shrubs is slated to become a new paved road: "Proposed roadway improvements include the realignment of Fiesta Island Road between the North Subarea and the Central Subarea, and a realignment in the Southeast Subarea; new crossover roadways between the North Subarea and the Central Subarea, and between the Central Subarea and the Southeastern Subarea..."

[https://www.sandiego.gov/sites/default/files/fiestaislandamendment\\_draft\\_peir.pdf](https://www.sandiego.gov/sites/default/files/fiestaislandamendment_draft_peir.pdf)

[see also Figure 32(a) Fiesta Island Concept Plan - Option A and Figure 32(b) Fiesta Island Concept Plan - Option B; also see figures 6(a) and 6(b) Proposed Roadway system in

<https://s3-us-west-1.amazonaws.com/fiesta-island/DraftPEIR/Fiesta+Island+MBMP+Amendment+Maps.pdf>].

## 2. Response to Comments

- AK-2 | My concern is multifold: (1) Doing away with the current dirt road to create a paved road skirting the habitat preserve in the Southeast Subarea would destroy the solitude and habitat for both humans and the Western Pygmy-Blue butterfly, among other species. If at all possible, please reconsider keeping the existing roadway that is closer to the perimeter of the island and having it cut across closer to the concession area (but see next comment); (2) Adding a concession and a campground so near to the habitat preserve would open the door to detrimental human impacts on the delicate ecosystem. I would like to see the Natural Preserve area expanded there instead, if possible; (3) Current plans for grading of existing habitat to get rid of invasive weeds such as brome grass and replanting with natives is ill-advised. Disturbed soil encourages more weed growth as it exposes new seeds. There are many members of the California Native Plant Society - San Diego Chapter and the San Diego Audubon Society who would gladly volunteer to weed around the various sensitive plant species in situ rather than having them dug up and relocated.
- AK-3 |
- AK-4 |
- AK-5 | I would love to see Fiesta Island maintained as a more-or-less Natural Preserve, with several current exceptions (dog park, youth camp, sand arena, etc). Where in any other big city can you find a peaceful and somewhat isolated space smack dab in the middle of a busy recreational area, such as Mission Bay? Enhancing the current habitat with trails and added native vegetation but keeping additional recreational use to a minimum would be a wiser choice.

Sincerely,

*Bonnie Nickel*

Member, California Native Plant Society, Audubon Society

## 2. Response to Comments

### **AK Response to Comments from Bonnie Nickel, dated January 16, 2019.**

- AK-1 The comment does not address the adequacy of the PEIR as it relates to CEQA. See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AK-2 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AK-3 See response to AK-2, above.
- AK-4 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AK-5 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AL – Caltrans (2 pages)

STATE OF CALIFORNIA – CALIFORNIA STATE TRANSPORTATION AGENCY		Gavin Newsom, Governor
<b>DEPARTMENT OF TRANSPORTATION</b> DISTRICT 11 4050 TAYLOR STREET, MS-240 SAN DIEGO, CA 92110 PHONE (619) 688-6960 FAX (619) 688-4299 TTY 711 www.dot.ca.gov		 <i>Making Conservation a California Way of Life.</i>
January 17, 2019		11-SD-5 PM 20.7 Mission Bay Park Master Plan-Fiesta Island Amendment DEIR SCH#2017051034
Ms. Rebecca Malone City of San Diego 9485 Aero Drive San Diego, CA 92123		
Dear Ms. Malone:		
AL-1	Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report for the Mission Bay Park Master Plan-Fiesta Island Amendment located near Interstate 5 (I-5). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.	
Caltrans has the following comments:		
AL-2	<b><u>Mission Bay Bridge Project</u></b> The Mission Bay Bridge Project is a City of San Diego project near I-5 with Caltrans having oversight responsibility. The construction for the Mission Bay Bridge project is anticipated to last through 2021. We recommend coordination between the City of San Diego and Caltrans for both projects.	
AL-3	<b><u>Right-of-Way</u></b> Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans's R/W, and any corresponding technical studies.	
<i>"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"</i>		

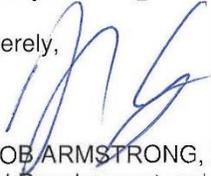
## 2. Response to Comments

Ms. Rebecca Malone  
January 17, 2019  
Page 2

AL-4

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to [kimberly.dodson@dot.ca.gov](mailto:kimberly.dodson@dot.ca.gov).

Sincerely,



JACOB ARMSTRONG, Branch Chief  
Local Development and Intergovernmental Review Branch

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

## 2. Response to Comments

### **AL. Response to Comments Caltrans, dated January 17, 2019.**

- AL-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AL-2 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AL-3 See response to AL-2, above.
- AL-4 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AM – Susan Walter (1 page)

**From:** Susan Walter  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** PROJECT NAME: Mission Bay Park Master Plan – Fiesta Island Amendment PROJECT No.: 562189 / SCH No. 2017051034  
**Date:** Thursday, January 17, 2019 1:54:19 PM

- AM-1 I am a snowbird from Oregon enjoying 6 months of San Diego warmth every winter. We visit Fiesta Island very often with our 2 dogs, at least once or twice a week. I joined FIDO 3 or 4 years ago and participate in Fiesta Island cleanup day. We also kayak on the bay.
- AM-1 My husband is a member of the San Diego Outriggers Club that is based in Campland. There is a very real possibility that Campland will be gone in the not too distant future and the Outrigger Club will lose it's base. Other landing areas for manually operated water craft are expected to be lost due to hotel expansion and other planned development. It looks like Fiesta Island is the only place on Mission Bay these clubs and kayakers can move to.
- AM-2 Reading about plans A and B, I have to ask, are these addressing the whole island or just the south end where the fenced dog park is located? Will there be a place for manually operated water craft like outriggers and kayaks on the north half of the island.? Also, why are dogs and these watercraft not compatible? I think they are so if it comes to these 2 plans, plan A is better if it could be less intrusive to the off leash area.

Susan Walter  
Sent from my Verizon, Samsung Galaxy Tablet

## 2. Response to Comments

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## 2. Response to Comments

### **AM. Response to Comments from Susan Walter, dated January 17, 2019.**

- AM-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AM-2 See Chapter 3, *Project Description*, of the PEIR. The only differences between Options A and B are in the Southwest Subarea. There would not be a specific location designated for manually operated watercraft in the northern half of Fiesta Island, but nonmotorized watercraft can be launched from any accessible shoreline, except where in conflict with specified natural habitat areas. Nonmotorized watercraft can be launched from the Southwest Subarea under both Option A and Option B.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AN – Susan Lathe (1 page)

**From:** SUSAN LATHE  
**To:** [PLN\\_PlanningCEQA](#)  
**Cc:** [Susan Shean](#); [Faulconer, Mayor Kevin](#)  
**Subject:** Mission Bay recreation  
**Date:** Friday, January 18, 2019 2:15:51 PM

---

Mission Bay

Thank you for your beauty for our city. Mission Bay Park Master Plan, Project Nu# 562189

Born and raised in San Diego I've enjoyed Mission Bay all my life in many ways. Mission Bay was build for the people to enjoy. Visitors from all over the world come to enjoy San Diego and Mission Bay is part of that. Campland brings people from other states and countries to stay and enjoy the weather

AN-1

and different activities. Audubon club wants to take Campland away so they can grow there area for the birds. Fiesta Island has the Fido group that does not want to share the area they are given in plan B. And we have Mr. Evans that want to expand which is fine that's his business. But to take over a public road that's one of the only accessible places for people to park and unload there non motorized craft into the water seems unfair.

AN-2

Obesity is at all time high. So why are we limiting non motorized craft to use the Bay? Stand -up paddlers, dragon boats, rowing, outrigging, and many more. If more of the people of San Diego knew about this what would they say?

Even our golf courses are disappearing. I think there is room for everybody.  
Sue Lathe

## 2. Response to Comments

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## 2. Response to Comments

**AN. Response to Comments from Susan Lathe, dated January 18, 2019.**

- AN-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AN-2 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AO – Walt Spencer (1 page)

**From:** Walt Spencer  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** Mission Bay Park Master Plan Fiesta Island Amendment Number: 562189  
**Date:** Friday, January 18, 2019 3:26:53 PM

AO-1

My wife and I, along with our 2 dogs, spend 6 months here in San Diego, enjoying a variety of outdoor activities. We greatly enjoy walking with our dogs on Fiesta Island. It is a fantastic resource. We also love being on the water in kayaks and canoes. While staying in Campland, I discovered Outrigger Canoe paddling, and was able to join the San Diego OCC and participate in recreational and race paddling. I love the sport, and it has gotten me in better physical condition than I ever expected to be at the age of 74.

I would hate to think that either of these activities would not be available to others in the future. At this point, since Campland has a very limited future, and other clubs are having similar problems with access to the Bay, I have to support Option A, which at least allows for both activities to coexist.

Outrigger Canoe paddling has a long history in San Diego, and is an integral piece of Pacific Island culture. It should be treated as an important part of what San Diego stands for.

Thank you for the opportunity for input.

Walt Spencer  
[REDACTED]

## 2. Response to Comments

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## 2. Response to Comments

### **AO. Response to Comments from Walt Spencer, dated January 18, 2019.**

AO-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AP – Kathy Parrish (3 pages)

**From:** Kathy Parrish  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** PROJECT NAME: Mission Bay Park Master Plan – Fiesta Island Amendment PROJECT No.: 562189 / SCH No. 2017051034  
**Date:** Sunday, January 20, 2019 3:10:22 PM  
**Attachments:** [Bad math.png](#)  
[Table 3-2.png](#)

To whom it may concern:

I've read through the Fiesta Island Amendment PEIR and have a few specific comments and questions as well as some general comments and questions:

**1. Table 3-2:** What is the difference between Option A having 30 vs. Option B having 20? Are you privileging watercraft over people who recreate by wading/swimming/walking on the beach?



### 3. Project Description

How is it we have less Active Recreation than Option A when we actively use ALL of it?

**Table 3-2 Comparison of Proposed Changes**

Uses	Existing	Option A	Difference (Opt A - Existing)	Option B	Difference (Opt B - Existing)
<b>Land Uses</b>					
Youth Camping – Lease Area	24	22	-2	22	-2
Primitive Camping – Lease Area	0	7	7	7	7
Circulation / Parking / Multi-Use Paths	18	31	13	29	11
Sand Management Area	20	7	-13	7	-13
Habitat Preserves	0	34	34	34	34
Least Tern Preserves	35	35	0	35	0
Active Recreation	0	30	30	20	20
Sand Arena	31	36	5	36	5
Beach	54	51	-3	51	-3
Coastal Landscape	264	181	-83	193	-71
Wetlands Habitat	3	15	12	15	12
<b>Subtotal</b>	<b>449</b>	<b>449</b>	<b>0</b>	<b>449</b>	<b>0</b>
<b>Water Uses</b>					
Wetlands Habitat	0	12	12	12	12
Eelgrass Habitat	0	5	5	5	5
Undesignated <sup>1</sup>	17	0	-17	0	-17

AP-1

**2. Tables 5.1.4 & 5.1.5** - you list construction emissions for Option A and B together and therefore the same--that can't possibly be correct since there is **no building or paving** in Option B.

AP-2

## 2. Response to Comments

3. **Table 5.2.6:** bad math--proofread for accuracy. You need to recheck all of your tables.

AP-3

**Table 5.2-6 Potential Impacts to Jurisdictional Waters and Wetlands, Acres Option A and B**

Habitat	Option A			Option B		
	Permanent	Temporary	Total	Permanent	Temporary	Total
<b>Impacts to Jurisdictional Wetlands</b>						
Southern coastal salt marsh	0.55	0.66	1.21	0.55	0.66	1.21
<b>Impacts to Waters</b>						
Saltpan/mudflats	0.50	3.03	3.53	0.50	3.03	3.53
Open Water	0.04	10.21	10.25	0.00	10.21	10.21
Eelgrass beds	0.04	10.21	10.25	0.00	10.21	10.21
Beach	0.08	5.75	5.83	0.07	5.75	5.82
<b>Total</b>	<b>0.66</b>	<b>29.2</b>	<b>19.61</b>	<b>0.57</b>	<b>29.2</b>	<b>29.77</b>
<b>Total, Jurisdictional Waters and Wetlands</b>	<b>1.21</b>	<b>29.86</b>	<b>29.86</b>	<b>1.12</b>	<b>29.86</b>	<b>30.98</b>

Source: Aiden 2017.

Bad math

### 4. And tsunami:

AP-4

"The shores of Fiesta Island are in tsunami inundation zones mapped by the California Emergency Management Agency (see Figure 2-15). The height of tsunami inundation on Fiesta Island is estimated at about 10 feet above msl based on ground surface elevations along the tsunami inundation limits. **Proposed buildings and other improvements that could be damaged by flooding would be built outside of the tsunami inundation zones. Project development would not place people or structures in tsunami inundation zones, and impacts would be less than significant.**"

So, the dock, the pier, the boat storage, the restrooms, etc, will all be at a height of at least 10 feet above the shoreline? And why wasn't sea level rise included in the EIR?

\*\*\*\*\*

General comments:

AP-5

- I wholeheartedly support Option B as the Alternative with the lowest environmental impact and the lowest cost, which should be more accurately reflected.

AP-6

- It's important for the Planning Department to analyze other locations in Mission Bay Park for the paddling group storage and dock, places which will require less construction (and therefore less environmental impact) and be less costly.

AP-7

- The continuous perimeter path and current access to the shoreline on all

## 2. Response to Comments

AP-7  
cont-d

three sides (East, West, and South) is extremely important for the way existing users exercise. Option A will completely eliminate off-leash shoreline access on the Southern shoreline, and it will also greatly discourage use on the East shoreline because of extremely limited ability to cross over the road.

AP-8

- All of the grading, paving, and construction in Option A is clearly less environmentally friendly.

Thank you for your time and attention.

Kathy Parrish

## 2. Response to Comments

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## 2. Response to Comments

### AP. Response to Comments from Kathy Parrish, dated January 20, 2019.

- AP-1 Option A includes a larger Dog Activity Park as well as additional active recreation area around a playground in the Southwest Subarea. Option B has Coastal Landscape in these areas. Active recreation is intended for flat, turf, open areas suitable for active play.
- AP-2 Construction impacts discussed in Section 5.1 of the PEIR are considered conservative. The air quality difference between Option A and Option B relating to the construction of a boat house and small segment of roadway would not change the numbers shown in Tables 5.1-4 and 5.1-5. It is reasonable to assume that less construction, including less roadway, would also result in fewer emissions. However, it is also reasonable to assume that a boat house might be constructed elsewhere on the island and would need an access roadway. The PEIR took a conservative approach to the air quality analysis in order to provide as much flexibility for future design as possible.
- AP-3 Table 5.2-6, Potential Impacts to Jurisdictional Water and Wetlands, Acres Option A and B, has been revised to reflect the correct number (see Chapter 3, *Revisions to the Draft PEIR*, of this FEIR). This revision does not change the findings of the PEIR; therefore, no further response is necessary.
- AP-4 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review. The project would not result in physical improvements within the tsunami inundation zones, as described in Section 5.5, *Hydrology and Water Quality*, of the PEIR. Any future improvements to Fiesta Island would be reviewed on a project-specific basis.
- Sea level rise is being addressed through other regional documents as the issue affects the entire coastline. The improvements mentioned by the commenter are designed to get wet, and endure storm surges, large waves, etc., in contrast to restrooms or storage areas.
- AP-5 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AP-6 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AP-7 Option A will not completely eliminate off-leash access to the southern shoreline, but it would be reduced compared to Option B.
- AP-8 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review. As provided throughout the PEIR, Option A would result in greater improvements than Option B, and therefore, would result in greater environmental impact.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AQ – Judie Lincer (2 pages)

**From:** Judie Lincer  
**To:** [PLN\\_PlanningCEO; conservation@ncpsd.org](mailto:PLN_PlanningCEO@ncpsd.org)  
**Subject:** PROJECT NAME: Mission Bay Park Master Plan – Fiesta Island Amendment  
**Date:** Sunday, January 20, 2019 3:40:24 PM  
**Attachments:** [image.png](#)

PROJECT NAME: Mission Bay Park Master Plan – Fiesta Island Amendment  
PROJECT No.: 562189 / SCH No. 2017051034  
COMMUNITY AREA: Mission Bay Park  
COUNCIL DISTRICT: 2 (Campbell)

To Whom It May Concern,

Regarding the above PROJECT : Mission Bay Park Master Plan – Fiesta Island Amendment

AQ-1 | I would love to see Fiesta Island maintained as a natural area, with mixed use for dog park, youth camp, sand arena, etc. How lucky we are too have such a peaceful and somewhat isolated space as we have in Mission Bay Enhancing the current habitat with trails and added native vegetation but keeping additional recreational use to a minimum would be a wiser choice.

AQ-2 | With the rare North American butterfly, the Western Pygmy-Blue (*Brephidium exilis*), and the Woolly Seablite (*Suaeda taxifolia*) shrubs that line the dirt road in the Southeast Subarea of Fiesta Island, this habitat should be safely guarded. This dirt road lined with those wild native shrubs is slated to become a new paved road: "Proposed roadway improvements include the realignment of Fiesta Island Road between the North Subarea and the Central Subarea, and a realignment in the Southeast Subarea; new crossover roadways between the North Subarea and the Central Subarea, and between the Central Subarea and the Southeastern Subarea..." [https://www.sandiego.gov/sites/default/files/fiestaislandamendment\\_draft\\_peir.pdf](https://www.sandiego.gov/sites/default/files/fiestaislandamendment_draft_peir.pdf) [see also Figure 32(a) Fiesta Island Concept Plan - Option A and Figure 32(b) Fiesta Island Concept Plan - Option B; also see figures 6(a) and 6(b) Proposed Roadway system in <https://s3-us-west-1.amazonaws.com/fiesta-island/DraftPEIR/Fiesta+Island+MBMP+Amendment+Maps.pdf>].

AQ-3 | My concern is multifold: (1) Doing away with the current dirt road to create a paved road skirting the habitat preserve in the Southeast Subarea would destroy the solitude and habitat for both humans and the Western Pygmy-Blue butterfly, among other species. If at all possible, please reconsider keeping the existing roadway that is closer to the perimeter of the island and having it cut across closer to the concession area (but see next comment); (2) Adding a concession and a campground so near to the habitat preserve would open the door to detrimental human impacts on the delicate ecosystem. I would like to see the Natural Preserve area expanded there instead, if possible; (3) Current plans for grading of existing habitat to get rid of invasive weeds such as brome grass and replanting with natives is ill-

AQ-4 | advised. Disturbed soil encourages more weed growth as it exposes new seeds.

AQ-5 |

AQ-6 | There are many members of the California Native Plant Society - San Diego Chapter and the San Diego Audubon Society who would gladly volunteer to weed around the various sensitive plant species in situ rather than having them dug up and relocated.

Please take this input seriously. You can't go back once you disturb habitat like this.

Sincerely,

*Judie W. Jeff Lincer* 

Judie Lincer, M.S. Ed  
Naturalist Educator

## 2. Response to Comments

California Native Plant Society-San Diego (CNPS-SD)  
Winter Workshop 2019 Co-Director  
Garden Tour 2019 Director  
[workshop@cnpsd.org](mailto:workshop@cnpsd.org)

[judie.lincer@cnpsd.org](mailto:judie.lincer@cnpsd.org)  
[judielincer@sdchildrenandnature.org](mailto:judielincer@sdchildrenandnature.org)  
[REDACTED]

“Ecosystems are not only more complex than we think, they are more complex than we *can* think.” Frank Egler



**“One generation plants the seeds, the next generation gets the shade.” Chinese proverb**

[www.sdchildrenandnature.org](http://www.sdchildrenandnature.org)

## 2. Response to Comments

**AQ. Response to Comments from Judie Lincer, dated January 20, 2019.**

- AQ-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AQ-2 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AQ-3 See response to AQ-2, above.
- AQ-4 See response to AQ-2, above.
- AQ-5 See response to AQ-2, above.
- AQ-6 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AR – Debra Madden (2 pages)

**From:** Debra Madden  
**To:** [PLN Planning/CEQA](#)  
**Subject:** Project Name: Mission Bay Park Master Plan-Fiesta Island Amendment Project No.: 562189/SCH No. 2017051034  
**Date:** Sunday, January 20, 2019 3:51:12 PM

Dear Ms. Malone,

- AR-1 I have several concerns and areas that I believe the PEIR has not adequately evaluated for both Option A and Option B.
- First, the very southwest portion of the island at Stony Point, is a Least Tern protected space. Option A would add grass, a playground, boat launch and storage, and a swimming beach which could contribute to added trash, waste and food in this area, drawing more predators into close proximity to the Least Tern area. Option B does not add these kinds of features with increased intensity of activity that would encourage more predators near the protected terns. The concern is that predators would disturb the nesting terns or even eat the Least Tern eggs and chicks. The Options must be thoroughly evaluated for the potential to impact the terns.
- AR-2 To quote from a letter from the San Diego Audubon Society in support of Option B sent Dec. 11, 2018 to the Mission Bay Park Committee:
- " The proposed Alternative A for redeveloping the area will bring many changes which will reduce the wildlife habitat value of the dog park, including a road across the area, high intensity recreation facilities, large turf areas, parking lots, and intensively used boat launch areas. It will also bring a swimming beach close to the nearby CA Least Tern nesting site, **which will increase the likelihood of inappropriate entry to the nesting area.**" ( my emphasis in bold added).
- AR-3 Second, the PEIR Executive Summary, Page ES-11 states that "Direct impacts to permanently designated least tern nesting sites shall not be permitted." I do not understand how the increased density and development in the proposed Option A does not significantly add pressure to the Stony Point proximity and is concluded to have "less than significant impact".
- AR-4 In the PEIR Executive Summary section 5.10 Public Utilities, the PEIR concludes that extending utilities for new restrooms and campgrounds require no mitigation and have an impact level "less than significant". Option A also proposes grass areas which require water. I find that conclusion inadequately supported. Option B clearly has less developed infrastructure and is the more sustainable alternative.
- AR-5 Third, Option A adds redundant facilities at the shoreline: a swimming beach, boat launch and storage areas. I say redundant since right across the channel sits South Shores with a huge swimming beach, picnic pavilion, boat launch, lots of paved parking and even bathrooms with running water-all of which are virtually unused. Option A would cost millions to create. The area needed to grade to manufacture a new beach is quite large. What are the environmental concerns about this grading? What kind of sand would be required to make a new beach? And where would the "foreign" sand come from and what is the impact of using it to create a new beach? I failed to find under the Biological Resources or Geological sections of the PEIR that address this concern. These issues must all be evaluated. Option B creates none of these potential negative impacts.
- AR-6 Again, to quote from the San Diego Audubon Society letter, "The plan will also add coarse grain sand to some of the beaches to discourage erosion. The coarse grain sand has been rejected for use on shorelines in Mission Bay as it provides much less foraging value for shorebirds than native sand, including the Threatened Western Snowy Plover. This ensemble of negative impacts will substantially reduce the wildlife support value of the Dog Park."

## 2. Response to Comments

AR-7

Fourth, the proposed city plan Option A adds an amphitheater for special events. I have not seen this feature evaluated for the increased demands it could place upon the southwest subarea under Option A, such as increased traffic, more GHG, and a general higher intensity of activity. Also, I believe that the proposed amphitheater highlights a lack of an organic planning process for Mission Bay. The South Shores plan includes an amphitheater, which has never been completed. Now, Fiesta Island Option A has added a second amphitheater right across the channel. And, as an observer and participant in the De Anza Revitalization Planning workshops, an amphitheater is also included in that area. Really? Three amphitheatres in Mission Bay? The cost of a special events amphitheater and the construction involved seems un-necessary for one site, let alone three. Option B does not add this feature.

Sincerely,

Debra Madden



La Jolla, CA. 92037

## 2. Response to Comments

### AR. Response to Comments from Debra Madden, dated January 20, 2019.

- AR-1 The commenter is correct in that the addition of playground, boat launch and storage, and swimming beach would result in a higher likelihood for added trash and food waste in the area. However, as provided in Section 5.2, *Biological Resources*, no impacts would occur to the two California least tern preserves as a result of operation of Option A or Option B. Additionally, implementation of mitigation measure BIO-3 for both Option A and Option B would reduce impacts to the California least tern during construction of any future improvements that requires clearing, grubbing or grading, or active wetland creation/restoration adjacent to the MHPA, California least tern preserves, or coastal salt marsh habitats during the City’s general avian breeding season of February 1 to September 15.
- AR-2 See response to AR-1, above.
- AR-3 The proposed improvements in the Southwestern portion of the island are not within a proximity to the least tern habitat such that they would have a direct impact.
- AR-4 Section 5.10 of the PEIR, *Public Utilities*, states that proposed water connections would follow the Fiesta Island Road loop and connect to the northern part of the island, and the southeastern and southwestern subareas. See also Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AR-5 The environmental impacts associated with grading under Option A are discussed in Section 5.5, *Hydrology and Water Quality*, of the PEIR. Import of new sand would be addressed for its environmental impacts at the project level, if proposed to be implemented. See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AR-6 While the current island is used as a sand management area, the sand is trucked onto and off of the island for use elsewhere. There are no plans, and nothing in the project description, that would suggest the use of coarse grain sand on the island. If this were to be required by a future improvement, the CEQA analysis for that improvement would need to address any impact.
- AR-7 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AS – Jean Spengel (6 pages)

**From:** [REDACTED]  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** PROJECT NAME: Mission Bay Park Master Plan - Fiesta Island Amendment PROJECT NO.: 562189/SCH No. 2017051034  
**Date:** Sunday, January 20, 2019 5:33:02 PM

PROJECT NAME: **Mission Bay Park Master Plan – Fiesta Island Amendment**  
PROJECT No.: **562189** / SCH No. **2017051034**

Dear Ms. Malone:

I had previously submitted a letter for the NOP for this project in 2017. I feel that a couple of the issues I brought up there have not been addressed:

AS-1

1. Please evaluate the environmental impact that bulldozing the berm and soil to create a swimming beach (in Option A) at the southern end of the Southwest area will have. The dirt used to fill Fiesta Island was from the marshland that was dredged away to make Mission Bay. Rose Creek, with all of the contaminants (including heavy metals) from industrial waste that was pumped into it in the first half of the 1900's, drained directly into the marsh soil. Is that soil still contaminated and will disturbing it result in release of contaminants into the bay water? Thus, shouldn't core sampling be done to determine if a beach can actually be built at the end of the island in the off-leash area. (Option B does not include this bulldozing)

AS-2

2. To create the swimming beach after bulldozing, they will have to bring in tons of non-native sand. What impact/risks will that have on the existing flora and fauna? (Option B does not include a beach)

3. How will the new road bisecting the off-leash area in Option A affect noise, air, soil and visual pollution? Additionally, how will the planned beach, amphitheater, playground and paddle facility further affect these?

AS-3

Most importantly, due to their close proximity to the Protected Least Tern Habitat, will the Terns be further endangered? I did not see any evaluation of this in the PEIR. Even the Audubon Society has written a letter of support in favor of Option B due to the reduced impact Option B would have on the wildlife habitat.

Per the Audubon letter of support: "The proposed Alternative A for redeveloping the area will bring many changes which will reduce the wildlife habitat value of the dog park, including a road across the area, high intensity recreation facilities, large turf areas, parking lots, and intensively used boat launch areas. It will also bring a swimming beach close to the nearby CA Least Tern nesting site, which will increase the likelihood of inappropriate entry to the nesting area. The plan will also add coarse grain sand...which has been rejected for use on shorelines in Mission Bay as it provides much less foraging

## 2. Response to Comments

AS-3 cont'd	<p>value for shorebirds than native sand, including the Threatened Western Snowy Plover. This ensemble of negative impacts will substantially reduce the wildlife support value of the Dog Park.”</p> <p>In closing the Audubon letter states: “The San Diego Audubon Society strongly urges the Committee to adopt Alternative B.”</p> <p>Additionally, both the Adopted Plan and the Fiesta Amendment state:</p> <p>“Fiesta Island: As an open landscape, Fiesta Island should be the place where City residents and visitors alike find the ultimate refuge from urban congestion, noise and visual clutter.”</p> <p>How does this road not bring noise, congestion and visual clutter to the area?</p>
AS-4	<p>4. Regarding the PEIR: There are other uses planned for the Southwest section under Option A,- an amphitheater, beach (requiring grading and importing of large amounts of sand), etc. Why are these not even mentioned under the PEIR and evaluated throughout the document?</p>
AS-5	<p>5. Sand arena, volleyball, OTL. Page 34 New Amended Plan states:</p> <p>“A potential expansion of the sand arena is proposed to the south of the existing arena. These improvements would make the arena a potential venue for nationally-televised events, bringing further attention to San Diego as a national recreation destination. “</p> <p>Has the increased traffic been evaluated in terms of noise, air and soil pollution?</p>
AS-6	<p>6. Under Roadway Improvements,- Section 94- New Roads.</p> <p>I would like to know if there is a definitive reason that the road direction is being reversed. The current counterclockwise pattern allows easy and continuous entry and exit from the island.</p>
AS-7	<p>7. Per the NOP:</p> <p>“The intent of the options is to develop a plan that respects long term existing uses on the island, reduces environmental impacts, reduces the acreage of developed parkland thereby reducing water use, and is economically feasible to implement”.</p> <p>This describes Option B in every aspect. And shouldn't off-leash users be given consideration as an existing user? We are actively walking, jogging, swimming and wading in the area 365 days a year,- the off-leash area is the most heavily used area of Mission Bay Park. Shouldn't off-leash use be considered as a valid recreational use of the</p>

## 2. Response to Comments

AS-7  
cont'd | area and given adequate space? The other uses you wish to place in this area can easily be placed elsewhere on Fiesta Island or in Mission Bay Park while off-leash has no other place to go. Why should you displace an existing user with a new use that has other possible locations within Mission Bay?

AS-8 | 8. In terms of the plan for the entire island, the new Plan Amendment plans to move large group picnics and public events from Crown Point to Fiesta Island. What effect will that have on vehicle traffic and associated pollution and how does that fit into the Plan goal which states:

“Fiesta Island: As an open landscape, Fiesta Island should be the place where City residents and visitors alike find the ultimate refuge from urban congestion, noise and visual clutter.”

**BELOW ARE OTHER, NEW ISSUES I WOULD LIKE TO ADDRESS:**

AS-9 | 9. I have spent hours going through the new Draft Fiesta Island Amendment- (December 2018) trying to compare it to the old Mission Bay Park Master Plan Update. You have to keep going back and forth between the two plans to figure out what’s in, what’s out, what’s unchanged, which maps and figures have been removed or changed. We need one continuous copy of the new Draft Amendment so we can actually read the document in order with new verbiage, maps, figures in order. Is that available or can it be produced?

AS-10 | 10. There are two options for the current off-leash area in the Southwest corner, Option A and Option B, which pit the paddlers against the dog-owners. Why has the city refused to find another space in Mission Bay where the paddlers can go and eliminate this conflict. This has been going on for 12 years for no reason.

FIDO completed a matrix showing other possible locations for the paddlers using the requirements that they themselves provided to the planner. Both South Shores and Mariners Point have most/all of the infrastructure they requested and they could be placed there quicker and much less expensively.

Even the Mission Bay Planning Committee asked this question when they voted on the two Options on January 8<sup>th</sup>, 2019. They asked: “Why not an Option C that gives the paddlers a space elsewhere in Mission Bay?” And by the way, they voted in favor of Option B by adopting the following motion:

MBPC Motion: **To Adopt Option B, retain the launch for the paddlers until a viable option for paddlers is designated and if not they stay at the current location as shown on Option A but without the road.**

AS-11 | 11. In all of the current plans and maps, it states that in Option A there are 85 acres of off-leash space while in Option B there are 92 acres of off-leash space. (As I understand

## 2. Response to Comments

AS-11 cont'd	it, the 7-acre difference is due to the road and parking lot in Option A) This is a false and misleading statement that seems to indicate that Option B supporters are fighting over a mere 7 acres of space, which is not true.
AS-12	In Option A, they also plan an amphitheater, a playground, view areas, restrooms and other infrastructure that certainly cannot be used for off-leash use. Plus, the bisecting road, parking lot and fencing will make it extremely difficult to get to the area east of the road and parking lot as there are only 2 places to cross over to the eastern section of supposed off-leash space. (Won't Option A also eliminate the berm walk around the entire area which so many people use as well?)
AS-13	What about Option A: Doesn't it significantly decreases practical and accessible off-leash space by about 40% or more and that should be indicated throughout the plans? Why doesn't the EIR include the impact of the loss of these additional spaces inside the off-leash area in Option A?
AS-14	12. In the new plan under Section 44 - Personal Watercraft (PWC) Trailer Parking: I have the following questions in red. Could you please clarify?  Option A: Within the Southwestern Subarea of FI, provide limited trailer parking and storage within the parking area at the southern end of the Island. <b>So how much of that parking lot goes to trailer parking and how much is open parking?</b>
AS-15	Option B: Within the Southwestern Subarea of FI, locate PWC vehicle parking at the northern end of Hidden Anchorage Cove. <b>So does that mean the additional parking being added at Hidden Anchorage becomes ALL trailer parking? If not, how much will be for PWC vs open parking?</b>
AS-16	13. Per the old Adopted plan as well as the New Amended plan:  “... South Shores should be intensively used park area that attracts visitors to a variety of public and commercial recreation venues yielding, in aggregate, a summary view of the Park's grand aquatic identity. For its part, Fiesta Island should remain essentially open yet supportive of a diversity of regional-serving public land and low-key, for-profit recreation and natural enhancement functions.”  Does this not support putting the paddlers (an aquatic identity) on South Shores and leaving Fiesta Island for diverse users, such as off-leash, in an open environment?
AS-17	14. Large Group Picnic P. 32/33 New Plan  “Large group picnic areas are located in conjunction with turfing areas within or near active recreation uses identified on the Fiesta Island Concept Plan Figure 32. A central

## 2. Response to Comments

AS-17 cont'd	<p>large turf area and an additional smaller area located within the southeastern subarea are proposed for large group picnic functions. Lying mostly outside the primary waterfront influence zone, these areas are large enough to hold informal non-league soccer, softball, multiple volleyball or touch football games. This area also includes restrooms, bocce ball courts, and playgrounds. “</p>
	<p>Am I to assume that on Fig. 32, the areas referred to as ‘Active Recreation – Parkland’ are the turfed areas as nothing else is labeled ‘turf’ on the figure. Could you please clarify exactly what/where these turfed areas are in the Southwest area in Option A and Option B?</p>
AS-18	<p>Option A: Two turfed areas are within the southwestern subarea that could provide for large group picnic functions. One would be oriented toward the dog off-leash activities and the other would be located near the proposed playground and restroom area and would be oriented toward children’s activities and active and passive recreation. Do we really want turf when the goal was to reduce water use? And aren’t picnic areas unsuitable in an off-leash area?</p>
	<p>Option B: Picnic options could be included within the active recreation area oriented toward the dog off-leash activities within the fenced off-leash dog area. Aren’t picnic areas unsuitable in an off-leash area?</p>
AS-19	<p>15. Under section 31, Open Play Areas:</p> <p>It describes two areas in Option A within the fenced off-leash area that “are available on a first-come, first-served basis to any group or public organization. Exception should be made to permitted picnic groups, which should be allowed to reserve such field areas as part of their permit”</p> <p>Doesn’t this create another potential conflict area between groups who want to use the area and off-leash use under Option A? (it is shown as ‘off-leash’ on Figure 32a) And it would obviously preclude off-leash use when permitted events are allowed to use the area.</p>
AS-20	<p>16. Figure 30a of the new Amended Plan:</p> <p>This map shows the proposed bike path in Option A. The bike path extends across the entire south end of the off-leash area. People using the area already ride their bikes with their dogs in this area. Is a bike path at the location really necessary?</p>
AS-21	<p>17. Lastly, the Master Plan and the Amended Fiesta Plan both state:</p> <p>“... South Shores should be intensively used park area that attracts visitors to a variety of public and commercial recreation venues yielding, in aggregate, a summary view of the</p>

## 2. Response to Comments

AS-21  
cont'd

Park's grand aquatic identity. **For its part, Fiesta Island should remain essentially open yet supportive of a diversity of regional-serving public land and low-key, for-profit recreation and natural enhancement functions."**

**"Fiesta Island: As an open landscape, Fiesta Island should be the place where City residents and visitors alike find the ultimate refuge from urban congestion, noise and visual clutter."**

**Are the current plans really following these guidelines? Everything seems to be geared toward bringing more traffic, more people and even creating a location 'for nationally-televised events, bringing further attention to San Diego as a national recreation destination. "**

Respectfully,

Jean Spengel

[REDACTED]

La Jolla, CA. 92037

## 2. Response to Comments

### AS. Response to Comments from Jean Spengel, dated January 20, 2019.

AS-1 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.

Erosion impacts are discussed in Section 5.5, *Hydrology and Water Quality*, of the PEIR. Future development per the proposed project would be required to adhere to the requirements of the City's Drainage Design Manual and Storm Water Standards Manual, which require installation of low-impact development (LID) practices, such as bioretention areas, pervious pavements, etc., which would improve surface drainage and not exacerbate flooding or cause erosion.

Impacts to flora and fauna as a result of project construction are discussed in Section 5.2, *Biological Resources*, of the PEIR. Implementation of mitigation measures BIO-1 through BIO-5 would result in less than significant impacts to biological resources.

AS-2 The environmental impacts of Option A related to construction of the road are discussed in the following sections of the PEIR: air pollution is discussed in Section 5.1, *Air Quality and Odor*; soil pollution is discussed in Section 5.5, *Hydrology and Water Quality*; noise impacts are discussed in Section 5.7, *Noise*; and visual impacts are discussed in Section 5.12, *Visual Effects and Neighborhood Character*. With implementation of mitigation measures AQ-1 and AQ-2, impacts as a result of roadway construction under Option A would be less than significant.

See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development in the Southwest Subarea, such as the swimming beach, playground, or non-motorized watercraft storage, would be subject to individual environmental review.

AS-3 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.

Both Option A and Option B retain the Least Tern Preserves and habitat buffer in the Northern Subarea and the Southwestern Subarea.

While the current island is used as a sand management area, the sand is trucked onto and off of the island for use elsewhere. There are no plans, and there is nothing in the project description that would suggest the use of coarse grain sand on the island. If this were to be required by a future improvement, the CEQA analysis for that improvement would need to address any impact.

See response to AS-2, which discusses environmental impacts as a result of construction and operation of the proposed roadway in the southwest portion of the island under

## 2. Response to Comments

Option A, including noise and visual impacts. However, as discussed in Section 5.9, *Transportation/Circulation*, under Option A, there would be impacts to Sea World Drive from Friars Road to East Mission Bay Drive, East Mission Bay Drive from Sea World Drive to Fiesta Island Road, Fiesta Island Road from East Mission Bay Drive to Fiesta Island Loop. As indicated by the levels of service shown in Tables 5.9-10 and 5.9-11 of the PEIR, development under Option A or B would not result in a significant contribution to significant impacts under weekday conditions, but would significantly contribute to significant impacts to certain segments under weekend conditions. While implementation of Mitigation Measures TRANS-1, TRANS-2, and TRANS-3 would increase capacity of the affected roadways, these measures are not recommended based on the City's need to consider transportation improvements on a comprehensive Citywide basis, which includes a focus toward shifting mode shares to active transportation, consistent with City plans and policies promoting active modes of transportation. Therefore, these impacts would remain significant and unavoidable.

- AS-4 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AS-5 See response to AS-3, above, and see Section 5.9, *Transportation/Circulation*, which analyzes project-related traffic increases as a result of buildout of Option A or Option B.
- AS-6 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AS-7 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AS-8 See response to comment AS-3, above.
- AS-9 The comment does not address the adequacy of the PEIR as it relates to CEQA or the project.
- AS-10 The comment does not address the adequacy of the PEIR as it relates to CEQA. Alternative storage and facilities locations are not a component of the proposed project. Project alternatives were analyzed in Chapter 9, *Alternatives to the Proposed Project*, of the PEIR.
- AS-11 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AS-12 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AS-13 See Table 3-2, *Comparison of Proposed Changes*, in Chapter 3 of the PEIR for proposed changes in land uses compared to existing conditions for Options A and B. The construction of the boat house and access roads, cuts through a part of the fenced off-leash shown in Option A, but does not preclude off-leash areas on the east side of the access area. As shown in Option A there would be connectivity between the two areas.

## 2. Response to Comments

- AS-14 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review. With implementation of Option A, the amount of trailer parking and storage and open parking would be determined prior to the time in which the proposed improvements would be constructed.
- AS-15 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review. With implementation of Option B, the amount of trailer parking and open parking would be determined prior to the time in which the proposed improvements would be constructed.
- AS-16 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AS-17 As provided in the Fiesta Island Amendment, active recreation areas include a variety of land-based active recreational pursuits in Mission Bay Park, such as sand volleyball, Over-the-Line, walking, cycling, and in-line skating. The active recreation areas include “turf” to support these uses. However, because the environmental impacts of the proposed project are being evaluated with a Program EIR, the exact amount of turf area will be determined prior to development of improvements in the active recreation area.
- AS-18 See response to AS-17, above. The picnic areas would be separated from the off-leash area, but could be oriented toward off-leash areas.
- AS-19 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AS-20 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AS-21 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AT – James Gonzales (1 page)

**From:** James Gonzales  
**To:** [PLN\\_PlanningCEQA\\_Osborn\\_Sara](#)  
**Subject:** Mission Bay Park Master Plan Fiesta Island Amendment and Number: 562189  
**Date:** Sunday, January 20, 2019 8:21:01 PM

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Hello,

AT-1 My name is James Gonzales. I've been a San Diego resident for the past twenty years. I moved here from Hawaii to go to school (SDSU). I ended up staying in San Diego because I fell in love with this city and all it has to offer. I'm an avid paddler and dog person. I frequent Fiesta Island often with my yellow lab (Kona) on a weekly basis. I understand the need for the off-leash area, but I also realize how large this area truly is and how it can accommodate both paddlers and dog owners alike. I was born and raised in Hawaii and I am cognizant of the price of land, especially waterfront property. I have seen both options and I am in favor of option A because it allows residents who have multiple uses for the area to enjoy it to its fullest. I feel an access road to a paddling launch and storage facility will not impede my ability to run my dog without a leash. Eighty plus acres is more than enough for us dog lovers to enjoy the island. Again, I am in favor of option A.

AT-2

Thanks you  
James Gonzales  
--  
**LIVE ALOHA!**  
--  
Live Aloha!

## 2. Response to Comments

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## 2. Response to Comments

**AT. Response to Comments from James Gonzales, dated January 20, 2019.**

- AT-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AT-2 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AU – Franklin Howard (1 page)

**From:** F.Howard  
**To:** [PLN\\_PlanningCEQA; Osborn, Sara](#)  
**Subject:** Mission Bay Park Master Plan Fiesta Island Amendment and Number: 562189 -Please Choose Option A  
**Date:** Sunday, January 20, 2019 9:12:44 PM

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Hello,

My name is Frank Howard. I came to San Diego from LA with the military in 1994 and have lived here ever since. I graduated from SDSU, got a job in Kearny Mesa and now I'm raising my two boys in the greatest city in America.

AU-1

I'm a dog person and an avid paddler. My rescue dog molasses is part boarder collie so we frequent Fiesta island. I appreciate the liberty of the off leash area and the large amount of open space to chase that tennis ball, meet some friends and generally get the wiggles out.

I also appreciate the resource of Mission Bay's itself. I take my sons kayaking and I competitively paddle outrigger canoes. It feels like these recreational activities are being pinched by either hoteliers, conservation groups and uncompromising dog owners.

Please be an example of cooperation and compromise in today's political climate!  
There is such an opportunity for positive compromise here.

AU-2

A road will not cause 80 acres of off leash area to be unusable!

Launching and active storage facilities will allow more people to enjoy the bay and maximize the best climate in the world.

Option A on land AND water gives us something to celebrate.  
I am strongly in favor of option A.

Thank you  
Franklin Howard

--  
Franklin "Skip" Howard  
[REDACTED]

## 2. Response to Comments

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## 2. Response to Comments

**AU. Response to Comments from Franklin Howard, dated January 20, 2019.**

- AU-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AU-2 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AV – Christine Harris (1 page)

**From:** christine  
**To:** [PlN\\_PlanningCEQA](#)  
**Cc:** [christine](#)  
**Subject:** Mission bay park master plan-fiesta island amendment project #562189  
**Date:** Monday, January 21, 2019 10:33:03 AM

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AV-1 | Hello,  
I am writing in support of PLAN A for Fiesta Island. I live in Escondido and I am a canoe and kayak paddler. I rely on access to the bay to recreate and exercise. I am looking forward to teaching my children (ages 4 and 7) how to be safe and have fun on the water, too. It is not feasible to park far from shore and carry my boat to the water, nor is it safe to launch next to or with motorized boats. Please consider Option A as the best choice for multi-use fiesta island.

Thank you,  
Christine Harris  


## 2. Response to Comments

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## 2. Response to Comments

### **AV. Response to Comments from Christine Harris, dated January 21, 2019.**

AV-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AW – Carolyn Chase (6 pages)

	<p><b>From:</b> Carolyn Chase <b>To:</b> <a href="#">PLN Planning/CEQA</a> <b>Subject:</b> Mission Bay Park Master Plan – Fiesta Island Amendment PROJECT No.: 562189 / SCH No. 2017051034 <b>Date:</b> Monday, January 21, 2019 1:47:10 PM</p> <hr/>
	<p>PROJECT NAME: <b>Mission Bay Park Master Plan – Fiesta Island Amendment</b> PROJECT No.: <b>562189</b> / SCH No. <b>2017051034</b></p>
AW-1	<p>1. Lack of analysis of alternatives to resolve conflicts between Options A &amp; B</p> <p>—Quoting from the NOP for this EIR: “The intent of the options is to develop a plan that respects long term existing uses on the island, reduces environmental impacts, reduces the acreage of developed parkland thereby reducing water use, and is economically feasible to implement.”</p> <p>which best matches Option B in the Plan and yet at the very end of the Document, the City names Option A as the project. And there is no analysis whatsoever for locating the PWC/paddler facilities in any other location on Fiesta Island or in Mission Bay Park such as South Shores or Mariner’s Point. Doing so, would bring Option B into compliance with the City’s stated list of project objectives.</p>
AW-2	<p>Hundreds of public comments supported Option B and the EIR reports that the environmental impacts for B are less than A. The costs for B are less than A due to significantly less required new infrastructure.</p> <p>Why hasn’t the City used planning to resolve the conflicts between Options A and B and create an Option C that all can support.</p>
AW-3	<p>2. Lack of adequate description of differences between A and B Where is the analysis of how much grading would have to be done for Option A related to the road and beach facilities. How much materials would have to be moved? imported or exported?</p>
AW-4	<p>3. Testing of Materials for pollutants? Fiesta Island is made of up dredgings and toxic materials are known to have been dumped into the the area in and around South Shores. Will the materials that would be disturbed on Fiesta Island be tested and publicly reported before the project design is determined?</p>
AW-5	<p>4. Lack of adequate description of treatment of the “cap” and perimeter path in Option A Option B retains and hopes to repair and maintain the perimeter cap around the Southwest area that is one of the most popular routings for walkers and runners, with and without dogs. It’s unclear what happens to this cap and perimeter path in Option A. Does the road cut through the cap and go down to a new, non-tidal beach where PWCs will be stored on the beach?</p>
AW-6	<p>5. Lack of Adequate Description and Analysis of New Beach</p>

## 2. Response to Comments

AW-6 cont'd	Would sand have to be imported to create the new, non-tidal beach in Option A? If so, how much? What would keep it from washing away? Does Option B include a new, non-tidal beach below the existing cap that is retained? What is the difference between Option A and Option B with respect to the shoreline and changes to shoreline beaches?
AW-7	<p>6. Lack of Complete New Plan for Public Review The Fiesta Island Plan Update website has links to the Existing (Old) Plan but only a partial, new draft for the New Plan. In many places, the online Draft New Plan repeats that there is no change from the Existing. But there are several examples where the Existing appears inconsistent with the New Plan.</p> <p>I strongly urge the City to put online a single, complete New Plan Draft with all the text combined into one Draft New Plan for everyone. The existing situation makes it difficult and unnecessarily time-consuming for the public to review the New Draft Plan in its entirety and provide corrective, productive comments. Does the Planning Department have such a complete New Draft Plan? Will the City put one online and accept public comments for potential change on the entire document?</p>
AW-8	<p>7. Lack of Notice for Plan Comments I was told that the City posted the Draft Plan in December, but even though I've commented on the Plan in the past, I received no such notice. When did such a notice go out and was I on the list to receive it? Did the City receive comments on the Plan since December? Will the City make changes to the Plan in response to comments now?</p>
AW-9	<p>8. Online Map Error figure 28 (b) Proposed Roadway System online at this link is illegible and needs to be reloaded/replaced with a correct, legible copy. <a href="https://s3-us-west-1.amazonaws.com/fiesta-island/DraftPEIR/Fiesta+Island+MBMP+Amendment+Maps.pdf">https://s3-us-west-1.amazonaws.com/fiesta-island/DraftPEIR/Fiesta+Island+MBMP+Amendment+Maps.pdf</a></p>
AW-10	<p>9. Space &amp; Leasing for Private PWC gear and Boats in Option A Is there an approximately one-acre area being reserved for private PWC-related storage in Option? Doesn't any private space on public parkland need to be considered an area for a new lease? How big is this area? Who would pay to fence it?</p>
AW-11	<p>10. Space &amp; Leasing for Boats on New Beach in Option A Would the new beach area in Option A where they would store boats also need them to have beach boat permits on the new public beach as is done elsewhere in Mission Bay Park? How much space is being planned for beach boat storage? Boat owners in the past have commented they do not want their boats in a dog area. Why does the city conclude that a new beach surrounded by an off-leash dog park is suitable for boat storage - especially when miles of existing under-utilized beaches exist in Mission Bay Park?</p>
AW-12	<p>11. Lack of Parking Quantification and Analysis of amount of pavement difference between Options A and B How many parking spaces are planned in Options A and B and of what kind, trailer and auto? It appears the Plan deletes the specific number of parking spaces from the prior plan. Does the New Plan allow for more, or fewer parking spaces on Fiesta Island and more or fewer parking spaces in Option A vs B? It appears that Option A would have more parking as it is allowing for parking along the road that cuts through the dog-park. How many and what kind of spaces</p>

## 2. Response to Comments

AW-12 cont'd	<p>are planned in each? What City parking requirements apply? What will apply to determining how much parking can be built? Would the new parking all be paved? Will the parking spaces along the road be paved? How is this determined? In trying to understand the differences between the amount of pavement that will be applied in Option A vs B, how wide and how long will the road in Option A be? How much more non-permeable pavement is there in Option A vs B?</p>
AW-13	<p>12. Lack of analysis of rerouting of storm water inland vs existing conditions What is the expected amount of retention of storm water internal to the road being changed such that it will drain internal to FI instead of existing that drains toward the bay? i.e. how fast would it drain or how much would it take to pond or leave standing water? One of the the effects of climate change that is already being manifested is an increase in the amount of rain falling during storms due to more water vapor being in circulation (among other factors). Would a peak storm event leave water ponding? Is there any quantity of water that falling that would create ponding? If so how much for how long? I've seen significant erosion from storm water drainage via beaches into mission bay and the City has then added sand a regraded. How will the City's sand management change in response to the change in road design to reroute storm water?</p>
AW-14	<p>13. Does not address removal of invasive species in Southwest Area / maintenance of natural landscape in a dog park I raised this issue in my NOP comments and they do not appear to have been addressed. Invasive grass that generate "foxtails" is inconsistent with dog park usage since the foxtail seed casings that are generated each year cause significant injuries to dogs. I didn't see anywhere in the EIR discussing the ability to manage the dog park with a maintenance regime to reduce their presence. Such a plan could require grading to remove seeds that have built up and potentially replacement of natural landscape materials in order to establish a new maintenance regime. Will this be analyzed in a forthcoming GDP but why isn't it in this PEIR?? Are there applicable City regs or policies about landscape plantings suitable/unsuitable for a dog park? How will this issue be able to be dealt with so that permits to address this can be obtained?</p>
AW-15	<p>14. Adding Regional Parkland on South Shores - Why not analyze adding PWC Location here, too? While the City has said at public meetings that the reason the PWC facilities in Option A cannot be relocated to a less costly location is because the Fiesta Island Plan Update can only address what happens on Fiesta Island. But the City itself is making a change at South Shores (Ref. Figures 9(s) and (b) Proposed Area (40 acres Outside Fiesta Island).  Since it's only a Plan Update i.e. it's the editing of documents at this point, changes can indeed be made in this process to resolve the conflicts between Option A and Option B. Who decided not to analyze this? Who can decide to make this change?</p>
AW-16	<p>15. City Did Not Analyze the Best Location for PWC Facilities to Minimize Impacts or Costs A location for the PWC facilities at South Shores better matches their list of needs than the location in Option A and allows the City to take advantage of existing infrastructure while reducing costs for Fiesta Island buildout including - fewer restrooms, less road pavement, less fencing, less grading, fewer impacts to wetlands and land. On the other hand, the City appears to be choosing the most expensive option for the desired "requirements."  Below is a list of written "requirements" submitted by PWC advocates during this process. Is</p>

## 2. Response to Comments

AW-16 cont'd	there any later list than from the Mission Bay Park Committee meeting 07/06/2010? How do existing conditions meet these requirements for Option A? South Shores? Mariner's Point?
AW-17	<p>An analysis done by volunteers rated existing conditions against a combined list of these requirements against existing and potential locations in Mission Bay Park showed the following:</p> <ol style="list-style-type: none"><li>1. <b>South Shores (13 yes; 2 No) BEST RATED</b></li><li>2. <b>Fiesta Island Youth Camp Location (10 Yes 5 No) EXISTING LOCATION</b></li><li>3. <b>Mariners Basin (10 yes; 5 No)</b></li><li>4. <b>North Cove - Vacation Isle (8 Yes; 7 No)</b></li><li>5. <b>South Cove - Vacation Isle (7 Yes; 8 No) *drain pipe in cove, requires construction of pier to cover pipe</b></li><li>6. <b>Fiesta Island's Southwest Shore (1 Yes; 14 No) OPTION A WORST RATED</b></li></ol> <p>Other existing locations rated in-between but are unlikely due to other uses:</p> <ol style="list-style-type: none"><li>7. MB Ski Club</li><li>8. Campland</li><li>9. SD Rowing Club</li><li>10. Mission Bay Aquatic Center</li></ol>
AW-18	<p>COMBINED LIST OF PWC/PADDLER REQUIREMENTS*</p> <p>NOTE: (#) indicates the original requirement number from the first list. NEW indicates added since original list.</p> <ol style="list-style-type: none"><li>1. Access to Mission Bay by way of a sand beach (1)Direct access to Mission Bay within 200 ft of shoreline</li><li>2. Beach storage (250 X 50 ft beach area for up to 30 paddlecraft) (2) Open beach storage for approximately 50 canoes, 250 ft length and 60 ft depth total area</li><li>3. Parking lot for 120+ cars without heavy uses during the peak paddling times (4)Parking for approximately 100 cars in close proximity</li><li>4. Close proximity of parking (drop-off point) to launching area</li></ol>

## 2. Response to Comments

AW-18 cont'd	<p>5. Room for freestanding storage building +/- or new restroom (3) Small equipment storage (paddles, flotation vests, etc) Approx 10 X 15 X 5 ft</p> <p>6. Near existing bathrooms and showers (7) Close proximity to restrooms</p> <p>7. Distance from site to ocean (outrigger and sea-kayak priority) (5) The most direct paddling route to the ocean</p> <p>8. Calm and clear water (minimal adjacent motorized activity with good water quality) (6) Minimal motorized activity adjacent to the area</p> <p>9. Water safety (paddle route through water use areas with 5 mph or less zone) NOTE: similar to 8 above, we kept it separate since it was listed separately by the PWC users.</p> <p>10. Beach and launch area protected from prevailing winds NEW</p> <p>11. Adjacent turf area for storage and boat preparation (9) Adjacent turf area (beneficial but not required) (8) Fresh water rinse capability (beneficial not requires)</p> <p>12. Security (secured perimeter and lighting to lessen theft of watercraft) NEW</p> <p>13. Closest to 1-5/1-8 (more than 10 minutes adds to local MB neighborhood traffic) NEW</p> <p>14. Compatibility with current leases, users and future designations NEW</p> <p>15. 500 foot bay course for Dragon boats NEW</p>
AW-19	<p>* From the beginning of the Fiesta Island Plan Update process in 2006, lists of "REQUIREMENTS" were submitted in writing by PWC groups. I took the lists and combined them into one complete list below. Lists were taken KTU&amp;A meeting notes 10/4/2006 and 6/2006 and Mission Bay Park Committee meeting 07/06/2010</p> <p>&lt;end of paddler requirements&gt;</p> <p>16. City Option A did not plan adequately for growth for fenced, off-leash dog users and best way to accomodate them with least impacts</p> <p>Requirements of fenced, off-leash dog users</p> <p>1. Retain existing fenced area intact and as natural as possible by Adopting Option B</p> <p>2. Resolve conflicts with PWC facilities by placing them outside the fenced, off-leash dog park</p>
AW-20	<p>- Dog users have no other fenced bay, shoreline access. The shoreline and perimeter paths are the most popular in the area now, used 365 days/year. This usage will continue to grow.</p>

## 2. Response to Comments

AW-20 | - Given the pressures of growth on all shoreline resources, existing and future dog users never  
cont'd | expect to attain increased, fenced, shoreline access.

AW-21 | While also planning for growth of other uses, it's imperative to protect the the Southwest Area  
as permanently as possible for off-leash users. This would include defining the project as  
adoption of Option B (the least environmentally damaging) while adding a location for the  
PWC/paddlers at either South Shores or outside of the fenced, off-leash area on Fiesta Island  
elsewhere in Mission Bay Park.

AW-22 | Thank you for consideration of these comments. As a past Planning Commissioner for the  
City, I am dismayed by the City's refusal to consider other locations for the PWC facilities in  
Mission Bay Park outside the fenced, off-leash dog park. In meeting with Coastal Commission  
staff at the earlier stages of this update, they also couldn't understand it, stating "there are 12  
miles of underutilized beaches in Mission Bay Park." Why not resolve the conflicts between  
Options A & B by using planning, rather than politics?

Sincerely,  
Carolyn Chase  
[REDACTED]  
San Diego CA 92169

## 2. Response to Comments

### AW. Response to Comments from Carolyn Chase, dated January 21, 2019.

- AW-1 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review. The PEIR analyzed proposed improvements to Fiesta Island; analyzing alternate locations for the PWC/paddler facilities in any other location is not part of the proposed project and therefore was not analyzed in the PEIR. The statement in the Chapter 9, *Alternatives to the Proposed Project*, that Option A is the proposed project has been removed. See Chapter 3 of the FEIR, Revisions to the Draft PEIR.
- AW-2 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AW-3 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AW-4 As described in Impact 5.2-6, in Section 5.2, *Biological Resources*, as part of the City’s MS4 requirements, developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials, and other elements that might degrade or harm the natural environment or ecosystems processes. In addition, in accordance with the CEQA Guidelines, future development will be analyzed for its potential for impacts related to hazardous materials release.
- AW-5 A “cap” and perimeter road is not addressed in the Amendment or within the PEIR for either Option A or B. See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AW-6 As discussed in Section 5.1, *Air Quality and Odor*, Phase I construction would require approximately 357,000 cubic yards of soil export and 216,000 cubic yards of soil import. It is not clear what the commenter is referring to as the “new non-tidal beach” in Option A, but imported sand would be used for beach-related improvements. Additionally, as discussed in Chapter 3, *Project Description*, under Options A and B the island would be recontoured to support the intended activity. As stated in response AW-1, the PEIR is a Program-level analysis, and proposed shoreline changes will be finalized prior to implementation of improvements to shoreline and beaches.
- AW-7 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AW-8 The Notice of Availability of the Draft PEIR was available for public review from December 7, 2018, through January 21, 2019 at the City of San Diego Planning Department, 9485 Aero Drive, MS 413, San Diego Ca, 92123 and online on the City website ( <https://www.sandiego.gov/planning/programs/ceqa>). The City sent out an

## 2. Response to Comments

email notification to those that commented on the Notice of Preparation. The comments received during the Draft PEIR public review period are addressed throughout this FEIR. Changes to the Draft PEIR are included in Chapter 3, *Revisions to the Draft PEIR*, of this FEIR.

- AW-9 The City has updated the link to Figure 26 (b). This figure is legible in the published Draft EIR and the comment does not impact the adequacy of the PEIR; therefore, no further response is necessary.
- AW-10 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AW-11 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AW-12 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review. Options A and B do not identify a specific number of parking spaces or what specific parking types would be allowed; Chapter 3, *Project Description*, describes that six parking lots would be proposed under Options A and B, although Option A would have a greater area designated for parking spaces. Proposed parking lot improvements would continue to comply with City of San Diego parking standards. As stated in response AW-1, the PEIR is a program level analysis, and square footages of pervious and impervious surfaces at the site would be determined as the improvements are built-out; an approximate comparison of the proposed uses is included in Table 3-2, *Comparison of Proposed Changes*, in Chapter 3 of the PEIR.
- AW-13 There is no design for the improvements on the island. Currently the perimeter roadway is constructed to drain over the beach and into Mission Bay. The proposed project would re-grade the roadway to direct stormwater into the island to reduce both the potential for pollutants to enter the bay, but also to reduce the potential for beach erosion from the road. See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AW-14 There are no design documents or planting plans for the island or the dog park area. Mitigation Measure BIO-1 requires a habitat / sensitive plant species survey prior to any ground disturbance. Foxtails are not a plant of environmental concern for CEQA, and the management or removal of them from the island would be part of a future development plan. See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AW-15 The commenter is correct in that relocating PWC facilities to a different location is not analyzed in the Draft PEIR because it is not within the scope of the project.

## 2. Response to Comments

- AW-16 See response to AW-15, above. The comment does not address the PEIR as it relates to CEQA.
- AW-17 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AW-18 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AW-19 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AW-20 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AW-21 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AW-22 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AX – Gary Cannon (8 pages)

Gary Cannon

[REDACTED]  
La Mesa, Ca 91941  
[REDACTED]

January 20, 2019

Sara Osborn, Senior Planner/Project Manager  
City of San Diego Planning Department  
9485 Aero Drive, MS 413  
San Diego, Ca 92123

Subject: PEIR for Fiesta Island/Amendment to Master Plan

Dear Ms. Osborn:

AX-1 As a longtime member of the outrigger canoe clubs of Mission Bay, I welcome this opportunity to comment on the Program EIR for the Fiesta Island Amendment to the Mission Bay Park Master Plan. Our clubs were active participants and commenters in the preparation of the pending EIR and Master Plan Amendment nearly 10 years ago at the various public workshops held throughout the City. Unfortunately, although we wrote letters and attended these workshops, we have not been acknowledged as stakeholders in the listing of stakeholders in the City's PEIR and have not been notified of pending public hearings. The only reason I am writing today is because the Fiesta Island Dog Owners (FIDO) alerted us to this issue via their Facebook page a couple of weeks ago. In addition to us, no other Mission Bay aquatic or land-based recreational users have been identified as stakeholders in the PEIR (other than FIDO) and thereby invited to participate in the subject CEQA review process. Those users include, but are not limited to, the San Diego Boy Scouts of America and The San Diego Canoe and Kayak team (both of which are based at the Fiesta Island Youth Aquatic Center), rowing clubs, swim clubs, bicyclists, windsurfers, paddle boarders, dragon boat paddlers, roller bladders, kayakers, fishermen, jet ski users and runners. I am also unaware of any signage that has been posted at and around Fiesta Island that would alert all current users to the proposed planning changes on the island. Also, in review of the letters of comment included within Appendix 1-2 of the PEIR, I have discovered that the attached letters of comment from AX-2 the emails of both the California Department Fish & Wildlife and the California Native Plant Society, San Diego Chapter were not included for public review. Finally, the AX-3 Federal Government has been shutdown for the past 29 days which may impact the ability of Federal agencies as formal stakeholders in the PEIR from reviewing and commenting on the subject PEIR. In my opinion, the comment period on the subject

## 2. Response to Comments

AX-3  
cont'd

PEIR needs to be extended to accommodate the City's notification of all existing users of Fiesta Island and to allow the outrigger canoe paddling community more time to provide comments. Because of tomorrow's deadline to comment on the PEIR, I offer the following additional comments.

AX-4

**Mission Bay Canoe Clubs.** The outrigger canoe clubs have been active users of Mission Bay since the early 1980's with the first club, Kai Elua Outrigger Canoe Club (OCC), forming in 1978 followed by Hanohano OCC in 1981 and San Diego OCC in 1985. In addition, our clubs are members of the Southern California Outrigger Racing Association (<http://www.scora.org>) consisting of 28 Southern California clubs that compete throughout the year both in California and around the world. There are now 5 outrigger clubs based on Mission Bay representing hundreds of active paddlers. In addition, two Pacific Ocean outrigger canoe races occur annually (in May and June) via Mission Bay Park bringing competitors from both the U.S. and international countries. The general mission statement of our outrigger canoes clubs is the "perpetuation of outrigger canoe racing both regionally in Southern California and worldwide, and to further maintain the rich Pacific island culture and traditions that are rooted in the sport". Although we have been active and responsible members of the Mission Bay aquatic community since the early 1980's, our clubs have had great difficulty since that time in finding locations around the bay to store and launch our 6-man canoes in safe and secure locations so as to not conflict with our other users of Mission Bay. Approximately 10 years ago, we became aware that two of our clubs had the potential of losing their home bases at Campland and the Mission Bay Boat and Ski Club resulting from the redevelopment of De Anza Cove. The current draft plan for the redevelopment of De Anza Cove now eliminates both of those recreational uses from that corner of Mission Bay. In recognition of that threat, the City of San Diego approached our clubs sometime around 2008-2010 to participate in future planning for Fiesta Island because we had been led to believe they would find space for our use in place of those lost around De Anza Cove. Following those workshops, we understood that the resulting Fiesta Island Amendment Plan included our use in the Southwest corner of the island. Subsequently, we have recently discovered that a scoping meeting for the PEIR was held in June of 2017 an event we were not invited to although we were known stakeholders. In fact, the only reason "non-motorized watercraft" storage and launching facilities are included in what is now called "Option A" is most likely because of our participation, so it is rather baffling as to how we were left out of formal notification of both the Notice of Preparation workshop as well as the subject PEIR. I should note that while we probably have been the most active "non-motorized watercraft" group involved in the early planning of the subject Amendment, we are fully aware that this is not an area that is to be designated for "outrigger canoes", but rather we are simply one type of that use that could make use of the area.

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AX-5 **Mission Bay Park Master Plan.** It is important to acknowledge that all of Fiesta Island, as well as most, if not all, of Mission Bay Park, lies within State Tidelands which are public trust lands that are to be held in trust by the State for the benefit of the people of California for recreational uses including the right to swim and boat. Both the California Coastal Act which governs use and development over these public trusts lands as well as the Mission Bay Park Master Plan, which serves as a general guidance document to the Coastal Commission, have provisions that support protection and enhancement of water related/dependent recreation uses and public access opportunities to coastal waters. I believe that all of these provisions support Option A as being more consistent with the Coastal Act and the certified Mission Bay Park Master Plan. As the Mission Bay Park Master Plan states:

*The uniqueness of Mission Bay Park lies in its aquatic setting. Fundamentally, the Park was shaped out of the water and it remains focused upon it. It is deemed essential, therefore that land use allocations in the Park be defined and arranged so as to maximize public access and enjoyment of the water. In other words, the zones with maximum exposure to the water should generally be reserved for those activities benefitting the most from such exposure . . . (See page 36 of Master Plan)*

AX-6 In addition, the Master Plan identifies that in order to increase the level of active or regional recreation, the southern portion of Fiesta island will be the **primary** location of new recreational beach areas for all of Mission Bay Park with up to 100 acres:

*The Master Plan Update recommends a 50 percent increase in areas dedicated for active or regional-serving recreation. This increase is equivalent to 100 acres of new turf and adjoining beach area. **Most of the new parkland is proposed in the southern portion of Fiesta Island and in South Shores.** [emphasis added] (See page 20 of Master Plan)*

AX-7 In addition, the Southwest corner of Fiesta Island is specifically identified as the location for most of the proposed 100 acres of new regional parkland designed for recreation and beach access:

***Fiesta Island:** About 100 acres of new regional parkland should be developed in Fiesta Island, most of it in the current sludge bed area in the southern end of the Island. Replacing the sludge beds with parkland constitutes **the only opportunity in the Park to gain net new land for recreation.** This area enjoys unequalled exposure to the Bay waters and surrounding landscapes, as well as safe convenient access to beaches with good water quality. This is one reason why it is proposed to relocate the planned habitat areas from the sludge beds to the northeast quadrant of the Park, west of the Rose Creek outfall. (The Environment Section of this Plan further elaborates on this recommendation.) [emphasis added] (See page 40 of the Master plan)*

## 2. Response to Comments

AX-8 If this area represents “the only opportunity in the Park to gain net new land for recreation”, then the area should be opened up for diverse number of recreation uses, not just a single 95 acre dog park. The Master Plan expressly provides for a diverse number of recreational uses be incorporated:

*In Mission Bay Park, maximum sustainable benefit means ensuring that the greatest possible number of users continue to enjoy the Park without compromising its ability to meet the recreational choices and needs of the future.*

*To achieve this goal, every square foot of the Park’s land and water should be planned to yield the most benefit for as many functions as possible.* [emphasis added] (See page 31 of Master Plan)

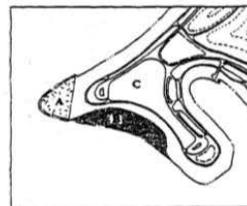
In addition, the Master Plan identifies the need for diverse aquatic uses, particularly non-motorized watercraft and adequate access for those aquatic uses:

*Mission Bay Park’s water areas should be allocated and maintained to support the diverse aquatic interests of those visiting Mission Bay, ensuring adequate access to, and safety and enjoyment of, the Park’s aquatic resources. In the interest of sustaining a desired level of recreation, the Park waters should be so used as to preserve an appropriate level of biological quality, benefitting both human activities and the interests of wildlife.* (See page 62 of the Master Plan)

**Beach Launching:** *The Park should contain a variety of beach launching sites for board sailors, kayakers, canoeists and rowers.* (See page 45 of the Master Plan)

In addition to a non-motorized watercraft storage and launch area, Option A of the subject Amendment, proposes a swimming beach and lifeguard station. Not only was a swimming beach contemplated in the certified Master Plan to be located on the southwest corner as proposed by Option A, the Master Plan actually proposed an even larger swimming area at that location:

**Swimming Embayment:** *A 4-acre embayment for swimming and wading is proposed in the Island’s southern peninsula. The embayment is also intended to serve as an eelgrass mitigation area. Should it prove mandatory to increase the mitigation area, the embayment could be enlarged to about 9 acres, as shown on the diagram to the right. This option also allows the retention of Stony Point as a Least Tern preserve, should any or all of the replacement sites prove unsatisfactory. This option, however, reduces the area of the peninsula available for active recreation by about 14 acres, contrary to the development objectives of the Plan.* (See page 132 of Master Plan)



**Optional South Fiesta Island Development**  
A: Stony Point Least Tern Preserve  
B: 9-Acre Swimming Embayment/Eelgrass  
C: Play Area

## 2. Response to Comments

In addition, the Land Use Goals of the Master Plan are fully supportive of Option A. In fact, I think it is important to note that the first stated land use goal in the Master Plan is for aquatic-oriented use:

*Mission Bay Park is a truly unique public coastal resource. The world's largest urban water- recreation park, its 2,100 acre land area supports a diversity of land and water uses including water- oriented public recreation, commercial and resort enterprises, and wildlife habitat.*

### *Land Use Goal 1*

*An aquatic-oriented park which provides a diversity of public, commercial and natural land uses for the enjoyment and benefit of all the citizens of San Diego and visitors from outside communities.*

- *1.1 A park in which all public recreation land use areas are designed and managed to maximize uses that benefit from the bay's unique environment.*
- *1.2 A park where the waterfront is designed and managed/or public access to the greatest extent possible.*

AX-11

### *Water Use Goal 1*

*A park in which the water areas are allocated and maintained to support the diverse aquatic interests of those visiting Mission Bay.*

*1.1 A park in which provision is made for the interests of all users including power boaters, sail boaters, competition and recreational waterskiing, boardsailors, rowers, jet skiers, personal watercraft users, swimmers, bird watchers, persons fishing and future unidentified users.*

### *Water Use Goal 2*

*A park which provides adequate and safe access to the waters of Mission Bay.*

*2.1 A park in which shoreline design and maintenance are managed to maximize water access within the context of shoreline stabilization needs, land use designations, environmental resources and regulations, aesthetic concerns, and public safety.*

### *Water Use Goal 3*

*A park in which the water areas are maintained to assure the maximum enjoyment of aquatic activities consistent with safety, aesthetic, and environmental concerns.*

*3.1 A park in which the highest water quality is maintained, and in which water access facilities and water recreation designations are appropriately designed and located with*

## 2. Response to Comments

AX-11 cont'd	<p><i>respect to aesthetic and environmental goals, and consistent with the maintaining public safety. .</i></p> <p>Water Use Goal 4</p> <p><i>A park in which water areas are maintained to assure continued navigability for designated uses, and in which adequate shoreline access for water use is I maintained.</i></p> <p><i>4.1 A park in which the consistent utilization of appropriate methods to maintain usability of water recreation designated areas is a primary goal of park planners and managers.</i> (See pages 177-179 of Master Plan)</p>
AX-12	<p>In addition to the all the policies and goals contained within the certified Mission Bay Park Master Plan which supports Option A, the California Coastal Act, which is the legal standard of review for all developments within Mission Bay Park, has extensive policies supporting the choice of Option A. I would suggest that before the Planning Department submits the Fiesta Island Amendment to the City Council for final action, the Planning Department request Coastal Commission staff review and comment on the proposed Amendment for consistency with the certified Master Plan and the Coastal Act particularly as it relates to Options A vs. B.</p>
AX-13	<p><b>CEQA Concerns.</b> I have read and largely support the findings and mitigation measures proposed for the adverse impacts identified in the draft PEIR by the proposed project, however, I have a couple of questions and concerns. My primary concern with the overall PEIR is that it does not list improving water quality within Mission Bay as a goal nor does it identify measures to provide any solutions to that issue aside from a new flap device on the causeway and new wetlands on the north side of the island and at the causeway. Perhaps I missed it in the PEIR, but please identify how runoff from around the island will be treated before it enters the waters of Mission Bay. I note that the draft PEIR says there are “nine known storm drain outlets in the Southwest Subarea which convey runoff from the dog park to Mission Bay”. I assume there are many more storm drains outlets around Fiesta Island as well. If so, please identify their locations and describe the areas they convey water from.</p>
AX-14	<p>Is the City proposing to treat the runoff from these storm drains outlets before it enters the waters of Mission Bay? As a regular user of the waters of Mission Bay, I would encourage the City to adopt a program that treats all runoff from Fiesta Island before it enters the bay through structural elements such as a bioswale. In addition, why isn’t regular water quality testing included in the plan? I would strongly recommend performing monthly water quality testing all around the island as well as immediate testing following significant rain events in conjunction with the County’s current water quality testing program. Currently the County does not test the waters around Fiesta Island. See current testing locations at <a href="http://www.sdbeachinfo.com">http://www.sdbeachinfo.com</a></p>
AX-15	<p></p>
AX-16	<p>Another question involves wetlands impacts. The PEIR identifies Option A and B will have approximately .55 acre of wetland. Please identify exactly where that .55 acre is.</p>

## 2. Response to Comments

AX-16 cont'd | Similarly, please identify exactly where the .66 acre of waters will be impacted by Option A and the .57 acre impacted by Option B. Once again, I may have missed it, but I cannot seem to find those locations identified in the draft PEIR.

AX-17 | Finally, please clarify the meaning of Figure 2-3, the “Adopted Fiesta Island Concept Plan”. Who “adopted” it and when? Is the PEIR asserting this concept plan is currently part of the certified Mission Bay Park Master Plan or is this simply a plan that the planning department has “adopted” as a concept plan?

AX-18 | Although I think the review period for the PEIR needs to be extended to allow for a more adequate review by the public and formal stakeholders, I thank the planning staff and all the other participants for the great work involved in its preparation.

Sincerely yours,

Gary D. Cannon

Attachment: Canoe club stakeholder contact list

CC: Joshua P. Coyne, Council District 2

Alex Llerandi, California Coastal Commission

## 2. Response to Comments

### MISSION BAY PARK OUTRIGGER CANOE CLUBS CONTACT INFORMATION

Kai Elua Outrigger Canoe Club  
1804 Garnet Avenue #107  
San Diego, Ca 92109  
[board@kaielua.com](mailto:board@kaielua.com)

Hanohano Outrigger Canoe Club  
[a\\_alley@hotmail.com](mailto:a_alley@hotmail.com)

San Diego Outrigger Canoe Club  
1804 Garnet Avenue #724  
San Diego, Ca 92109  
[SanDiegoOutrigger@gmail.com](mailto:SanDiegoOutrigger@gmail.com)

Ikuna Koa Outrigger Canoe Club  
2606 N Mission Bay Dr  
San Diego, CA 92109  
[pohaikealohamaui@hotmail.com](mailto:pohaikealohamaui@hotmail.com)

Kapolioka'ehukai Outrigger Canoe Club  
[kimbolivar1@yahoo.com](mailto:kimbolivar1@yahoo.com)

In addition, to the outrigger clubs, the San Diego Dragonboat Team has asked to be included in this list of contacts:

San Diego Dragonboat Club  
% 9 Vienna  
Laguna Niguel, Ca 92677  
[andrea.liskay@gmail.com](mailto:andrea.liskay@gmail.com)

## 2. Response to Comments

### AX. Response to Comments from Gary Cannon, dated January 20, 2019.

- AX-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AX-2 The email from Frank Landis of the California Native Plant Society is included as PDF page 78 of Appendix 1-2 of the PEIR and the comment letter is included as an attachment to the email. The email from Dolores Duarte of the California Department of Fish and Wildlife is included as PDF page 79 of Appendix 1-2 of the PEIR and the comment letter is included as an attachment to the email.
- AX-3 The Federal Government shutdown did not begin until after the start of the public review period (starting December 7, 2018). Federal agencies have submitted their comments on the subject PEIR within the public review period.
- AX-4 The comment does not address the adequacy of the PEIR as it relates to CEQA. See response to AX-1 for discussion of notice distribution and stakeholder involvement.
- AX-5 See Table 5.6-2, *Mission Bay Park Master Plan Consistency Analysis*, in Section 5.6, *Land Use*, which evaluates the proposed Options A and B for consistency with the Mission Bay Park Master Plan. The proposed project Options were prepared in accordance with the goals and objectives of the Mission Bay Park Master Plan.
- AX-6 See response to comment AX-5, above.
- AX-7 See response to comment AX-5, above.
- AX-8 See response to comment AX-5, above.
- AX-9 See response to comment AX-5, above.
- AX-10 See response to comment AX-5, above.
- AX-11 See response to comment AX-5, above.
- AX-12 The proposed project includes a Local Coastal Program Land Use Plan that requires approval from the City, and certification by the California Coastal Commission for consistency with the California Coast Act. Appendix 5.6-1 of the PEIR compares the proposed project to the policies of the LCP Land Use Plan and determined that the proposed project would be consistent with the policies.
- AX-13 See Section 3.3, *Project Objectives*, of the PEIR, which identifies “improve water quality by reducing erosion along the existing perimeter roadway” and “improve water quality by providing hydraulic connectivity under the existing causeway” as project objectives. See Section 5.5, *Hydrology and Water Quality*, which determined that the project would result in a less than significant impact to water quality. Future development per the proposed project would be required to adhere to the requirements of the City’s Drainage Design

## 2. Response to Comments

Manual and Storm Water Standards Manual, which require installation of low-impact development (LID) practices, such as bioretention areas, pervious pavements, etc., which would improve surface drainage and not exacerbate flooding or cause erosion.

Future development projects that could occur per the proposed project would have the potential to change pollutant discharges. However, as future development in accordance with the proposed project occurs, applicable NPDES permit requirements would require the retention and/or treatment of storm water through the implementation of BMPs. Future development would be required to demonstrate how pollutants such as various trace metals (e.g., copper, lead, zinc, and mercury), fecal coliform bacteria, low dissolved oxygen, phosphorus, and total dissolved solids that could be associated with future development would be treated to prevent discharge into receiving waters. As mentioned in Impact 5.5-1, the island's perimeter road would be re-contoured to alter storm water drainage flows into the island as opposed to allowing the water to flow to the beach and bay, and a bioswale of variable width would be created to capture the storm water. This proposed feature would decrease pollutant discharge to Mission Bay from Fiesta Island.

Under current storm water regulations in the City, all projects requiring approvals are subject to certain minimum storm water requirements to protect water quality. Types of storm water BMPs required for new developments include site design, source control, and treatment control practices. Storm water BMPs would reduce the amount of pollutants transported from a future proposed development project to receiving waters. Subsequent projects implemented in accordance with the proposed project would be subject to existing regulations in place at the time projects are implemented. Thus, implementation of the proposed project would result in a less than significant impact related to water quality.

- AX-14 See response to AX-13, above.
- AX-15 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AX-16 See Figures 6a and 6b in Appendix 5.2-1, Biological Technical Report, which shows areas of permanent and temporary impacts to wetlands and water on the project site.
- AX-17 Figure 2-3 is a rendition of the adopted Fiesta Island Concept Plan and was included to improve the visibility of plan details compared to the image of the adopted plan. The Figure included in the PEIR is in error and the original has been included in Chapter 3, *Revisions to the Draft PEIR*, of this FEIR.
- AX-18 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

LETTER AY – San Diego Chapter CNPSSD and San Diego Audubon Society (8 pages)



San Diego Chapter of the California Native Plant Society  
P O Box 121390  
San Diego CA 92112-1390  
conservation@cnpsd.org | www.cnpsd.org



San Diego Audubon Society  
4010 Morena Boulevard  
San Diego, CA 92117  
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January 21, 2019

Rebecca Malone  
Environmental Planner  
City of San Diego Planning Department  
9485 Aero Drive, MS 413, San Diego, CA 92123  
by e-mail to PlanningCEQA@sandiego.gov

**RE: Mission Bay Park Master Plan – Fiesta Island Amendment PROJECT No.: 562189,  
SCH No. 2017051034**

Dear Ms. Malone,

Thank you for the opportunity to comment on this draft of Fiesta Island Amendment to the Mission Bay Park Master Plan ("Project") draft programmatic environmental impact report ("DPEIR").

The San Diego Chapter of the California Native Plant Society ("CNPSSD") promotes sound plant science as the backbone of effective natural areas protection. We work closely with decision-makers, scientists, and local planners to advocate for well informed and environmentally friendly policies, regulations, and land management practices. Our focus is on California's native plants, the vegetation they form, on keeping both plants and people safe from damaging fires, and on climate change as it affects both.

San Diego Audubon Society ("SDAS") has been involved in protecting and advocating for wildlife, habitat, and the conservation of natural resources in Mission Bay for decades. Our work has included leading habitat restoration projects at the California Least Tern nesting sites, training community scientists to identify and manage native plants, and educating school children about the importance of respecting "bird only" habitat areas. Over the years we have engaged with thousands of volunteers at these Mission Bay sites, and have worked with a number of partners including the CNPS, CA Department of Fish and Wildlife and the Mission Bay Park Rangers. SDAS also participating in the development of the Mission Bay Master Plan Update, the Natural Resources Management Plan, and the Shoreline Stabilization and Restoration Plan.

While it is good that there is movement on updating the Mission Bay Park Master Plan, the details concern our two organizations. There are multiple issues with plants, wildlife, and greenhouse gas impacts, most of which can be readily fixed. We present our concerns below. Questions are highlighted, simply to make them easier to find and answer.

## 2. Response to Comments

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### PLANT ISSUES

#### Impact Avoidance

The first, foundational problem with the Project is that it proposes to wipe out special status native plants and rare plant habitats—coastal sage scrub and foredune scrub-- to replace them with landscaping designed to mimic coastal sage scrub and foredune scrub. **Why is this? Doesn't it make more sense to simply leave the native plants alone?**

As CEQA states (section 15370): “Mitigation includes: (a) Avoiding the impact altogether by not taking a certain action or parts of an action. (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation. (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action. (e) Compensating for the impact by replacing or providing substitute resources or environments.”

AY-2

**Why does the Project skip the perfectly feasible choices (a)-(d), which require minor mapping changes, weeding, and similar perfectly feasible activities, and go straight to the expensive and problematic (e), with proposals to translocate sensitive plants and then relandscape their former home with native plants? .If the Project's goal is to produce native plant landscaping, why not simply work with what is already on Fiesta Island, and limit the re-landscaping only for areas that have no native plants? Why not make preservation of the native plant species already on the island a Project Objective (p. 3-1)? Why not change mitigation BIO -1 from stating that impacts to sensitive plant species *should* include avoidance to *will* include avoidance or *will prioritize* avoidance? Should the Project not continue to follow the Mission Bay Master Plan Natural Resource Management Plan, specifically to “continue to set aside land essential for the preservation of rare and endangered species” (Appendix E, page 7)? Why not even follow the maps of the Biological Technical Report (Appendix 5.2-1 figures 4a and 4b) which show a less destructive Project that, among other things, avoids the native plant areas on the eastern edge of the central area?**

**How are sensitive annual plants, including Nuttall's lotus (*Acmispon prostratus*), coast woolly-head (*Nemacaulis denudata* var. *denudata*), and Lewis' evening primrose (*Camissoniopsis lewisii*) supposed to be translocated, per Mitigation Bio-1? They will not survive being dug up and replanted and their seeds are tiny, requiring laborious and skilled collection efforts. They set seed at different times of the year, so three separate efforts will be even to collect seed. Worse, their populations can fluctuate ten-fold between wet and dry years, and their respective seed banks would need to be translocated as well. **Where is the detailed mitigation plan that explains how this will all be done successfully? Can it be done successfully? If the species cannot be translocated, is the Bio-1 mitigation even feasible, or will this result in take of special-status plants?****

AY-3

**Is the Project deferring tricky mitigation planning while approving the impact? It certainly appears that this is deferred mitigation. For instance, Mitigation Bio-1 is “Prior to any construction or grading activities, the City shall prepare a mitigation plan in accordance with the requirements of the City's Biology Guidelines, MSCP Subarea Plan, and Land Use Adjacency Guidelines.” This is a classic deferment statement that could easily be challenged. Mitigation to address significant impacts cannot be properly addressed by just stating there will be a mitigation plan. *There needs to be an effort made to show that mitigation is possible, before it can be accepted that it will mitigate impacts.* This plan will need to be described in a clear and concise**

AY-4

## 2. Response to Comments

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CONT'D

matter so the public and stakeholders can determine whether it in fact mitigates impacts to less than significant. **Why not just simply avoid as many impacts as possible?**

### Mapping Issues

AY-5

There are issues with the maps. For instance, on page 2-25, Table 2.4, 123.04 acres of wetland habitats plus 398.1 acres of upland habitats equals 521.1 acres, not 464.03.

AY-6

A bigger issue is that the maps omit valuable information. The biggest problem is that most of the island is mapped as “disturbed land.” This catch-all category contains everything from weed fields that contain no native species to stands of facultative wetland plants, namely willows (*Salix goodingii* and *laevigata*) and mule-fat (*Baccharis salicifolia*), in the central subarea (Fig. 1, below). Numerous areas of “disturbed lands” contain enough native plants that the areas could be successfully restored. The mapping of “disturbed lands” also misses critical wildlife resources, including stands of large quailbush (*Atriplex lentiformis*, Fig. 2 next page). As a result, the map systematically undervalues wildlife habitat, misses restoration opportunities that could decrease the cost of relandscaping the island, and clears the way for putting a sand management area in the middle of a (presumably wet) space that supports wetland plants. **Why was this done? Are there more useful ways to map the island’s plants?**



**Fig. 1. Seep-willow clump where sand management area is proposed. This is mapped as “disturbed land.”**

### Incomplete Rare Plant Surveys and Incomplete Impact Analysis

AY-7

On the two preserved Least Tern sites on Stoney Point and the Northern Preserve, there were no plant surveys conducted (Stated in Appendix 5.2-1 Biological Technical Report, Section 2.2.3, Page 7). However, the San Diego Audubon Society works year-round to protect native species through habitat restoration events that occur on these sections of Fiesta Island. These include Nuttall’s Lotus (*Acmispon prostratus*), Coast-Woolly Heads (*Nemacaulis denudata* var. *denudata*), Lewis’ Evening Primrose (*Camissoniopsis lewisii*) and Red Sand Verbena (*Abronia maritima*). **Why were these not surveyed? How will the Project impact these plants? How will the impacts be mitigated?**

## 2. Response to Comments

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AY-8

**During construction and invasive species plant removal, what measures will be taken to prevent invasive plant material, including seeds, from scattering into the least tern sites? Spreading weeds into these areas would reverse years of restoration work by hundreds of volunteers who participate in habitat restoration of the native plants on these two sites. Why was this not analyzed? Why are mitigation measures for it not presented in the impact analysis (Threshold BIO-6)?**



**Fig 2. Quailbush clump, central island, mapped as “disturbed land.” Several sparrows flew out as this picture was taken.**

AY-9

**Landscaping Guidelines in the Adopted Mission Bay Master Plan: Do They Still Apply? Are the landscaping guidelines presented in the Mission Bay Master Plan considered to be the guidelines for the Project? If so, there are problems. If not, what are the plant palettes to be used in the Project?**

AY-10

The first problem: according to the Mission Bay Master Plan (Appendix G, p. 18), the invasive, non-native Mexican fan palm (*Washingtonia robusta*) “should be among the plants considered to be used in the Beach/Coastal Strand landscape, including on Fiesta Island.” **Are Mexican fan palms or other invasive species still on the plant palette?** Considering how much money the City spends every year removing these from other parks, this seems like a bad idea. Moreover, using invasive plants in landscaping contradicts the DPEIR (p. 5.2-31) that “The proposed project would follow the SDMC’s Landscape Standards and would not use invasive species in landscaping, which would prevent their introduction to the MHPA.”

AY-11

Second, the “Coastal Sage Scrub” palette given in the Master Plan is (p. 20): “[t]his landscape consists of shrubs, ground cover, palms and trees typical of the coastal environment such as *Coreopsis* spp.), Bush Poppy (*Dendromecon harfordii*, *D. rigida*), California Sagebrush (*Artemisia californica*), Wild Lilac (*Ceanothus* spp.), Hollyleaf Redberry (*Rhamnus crocea ilicifolia*), Torrey Pine (*Pinus torreyana*), Coastal Live Oak (*Quercus agrifolia*) and Coral Tree (*Erythrina* spp.).” **Is this the list to be planted on Fiesta Island as “coastal sage scrub”? If not, what plants are on the palette? Would non-native plants, such as palms and coral tree, be chosen? Since *Coreopsis* is an enormous, worldwide genus and the one**

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CONT'D

**former *Coreopsis* in San Diego is the rare *Leptosyne maritima* that prefers coastal bluffs, what is meant by including this genus? Why consider trees at all in a coastal sage scrub palette, since we all know that native coastal sage scrub contains no native trees at all? Why consider chaparral plants such as ceanothus, tree poppies, or hollyleaf redberry, as none of them currently grow on Fiesta island? Why not consider the saltbushes and sumac that naturally seeded themselves in and have flourished? If the planting plan has not been determined for the Project, how can its impacts be analyzed and mitigated? Why create permanent impacts to sensitive species for an unknown landscaping plan?**

### **Weeding: foxtails and dogs**

**What will be done to control non-native invasives on Fiesta Island?** While CNPSSD has not had many interactions with the dog walkers, we have heard several complaints of dog owners who had to take their dogs to the vet for expensive removal of “foxtails” (seeds of the non-native *Bromus* grasses) from their dog’s noses and paws. These weedy grasses are ubiquitous on the southern half of the island (see fig. 3 below)

AY-12

Simply bulldozing and planting shrubs will not remove the ubiquitous weeds (Fig 2., below). Indeed, they will probably spread, to the detriment of dogs, humans, and horses.

Both CNPSSD and Audubon have active weeding programs, and CNPSSD’s group has won several awards for their innovative techniques. If there are patches of native plants on a site, CNPSSD can restore an acre of land for around \$1,500-\$2,000 through removing weeds around native plants and allowing the natives seed out from their clumps and recolonize the areas formerly dominated by weeds. **Is the City willing to consider this kind of restoration in place of relandscaping?**



**Figure 3.** Southeastern portion of Fiesta Island. The green is primarily non-native grasses, many of which will produce foxtails.

### **Introducing Pathogens to Fiesta Island**

AY-13

CNPS statewide has found serious problems with pathogens infecting nursery stock. The worst of these are the water molds (*Phytophthora* species), which include the Irish potato blight (*Phytophthora infestans*) and sudden oak death (*Phytophthora ramorum*). Current research

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CONTD

suggest that most or all nurseries are infected with water molds, and that water molds from all over the world are escaping into landscaping and restorations from infected plantings, sometimes with tragic consequences (as for the endangered pallid manzanita on Huckleberry Ridge<sup>1</sup>). Over 100 water mold taxa have been found in nursery stock and on outplanted restoration plants, and some are new to science. While CNPS is spearheading efforts, in cooperation with nurseries, to decontaminate nurseries statewide and to help everyone grow and sell clean plants, this will take time, and the current assumption is that all nurseries that have not been sanitized are infested.

This is one huge reason to minimize the amount of planting done on Fiesta Island: the amount of nursery stock known to be clean is currently small. The fewer new plants that go in, the less chance that a pathogen will be introduced that will wipe out some native species on the island. CNPS provides resources to help deal with the problem of Phytophthoras and other nursery pathogens.<sup>2</sup> **Will the City commit to minimizing the introduction of possibly contaminated nursery stock, promulgating sanitation measures in nurseries and by restoring and seeding where possible?**

### WILDLIFE ISSUES

AY-14

All of the issues about deferred mitigation for impacts to sensitive plant species also apply to sensitive animal species. **How many of these can be avoided by simply changing the landscaping designations, preserving native plants on the site, and restoring areas rather than bulldozing and relandscaping them?**

### Habitat

AY-15

As noted above in the discussion on maps, a substantial number of native shrubs disappeared into the overly broad category of “disturbed lands.” **How many shrubs and trees provide cover and nesting habitat for birds and mammals on Fiesta Island? How many of these are on disturbed lands? What can be done to avoid impacting them?** Selective preservation of useful habitat, along with elimination of weeds, will go far to not only eliminate impacts to sensitive wildlife species, but also increase their numbers on the island, with no loss to other uses for the island.

### Noise

AY-16

Noise affects wildlife. **Why does the opening section (p. 5.2-29) state, “Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Isn’t a stronger word, like “will” or “shall” warranted? This is a problem throughout the section. Why are berms and walls not mandated adjacent to commercial areas (instead of “should be constructed”)? Why are adequate noise reduction measures not mandated for the length of the project (instead of “should be incorporated”)? What are adequate noise reduction measures, and how is their effectiveness analyzed? Are there further impacts that need to be mitigated?**

### Wildlife Corridors

<sup>1</sup> <https://www.wildlife.ca.gov/Conservation/Plants/Endangered/Arctostaphylos-pallida>

<sup>2</sup> <https://sites.google.com/site/cnpsphytophthoraresources/>

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AY-17

The analysis of wildlife corridors (Section 2.5.6, p. 2-35) comes to the conclusion Fiesta Island is not a wildlife corridor or part of a wildlife corridor. The problem is that, as a semi-wild coastal space in the middle of an almost completely urbanized environment that constrains movement of birds, it does have the function of a wildlife corridor, especially for birds. As noted in the DPEIR (p. 2-17, section 2.5.1): ““The entire project is within the City’s MSCP Planning Area per the City’s MSCP Subarea Plan... These lands have been determined to provide the necessary habitat quantity, quality and **connectivity** to support the future viability of San Diego’s unique biodiversity and are thus considered sensitive biological resources under the City’s ESL Ordinance and Regulations.” **Why was Fiesta Island considered not a wildlife corridor? Won’t the construction of a 900 acre wetland on the inlet to Tecolote Creek increase its connectivity to other nearby wild areas? What changes in the analysis if Fiesta Island is considered part of a wildlife corridor? Why not simply change this designation throughout the Project and its DPEIR?**

### GREENHOUSE GAS EMISSIONS

AY-18

**Where is the greenhouse gas reduction plan in the Mission Bay Master Plan? Does this not need to be written?**

AY-19

**Was the City Climate Action Plan checklist intentionally left blank?** In the absence of evidence, it appears that the Greenhouse Gas analysis relies primarily on assertions in the absence of any planning. **Wouldn’t it be more defensible to show the assumptions, to provide a quantitative justification for the analysis?** Additional issues are given in the next section.

### OVERALL LACK OF QUANTITATIVE ANALYSIS

AY-20

Apparently, the entire DPEIR suffers from a lack of detail (p. 3-2): “ The proposed project updates the vision and land uses for Fiesta Island in the Mission Bay Park Master Plan and describes a program for the general location, scope, and type of future improvements on Fiesta Island. No construction-level details or implementation plans have been developed to complete the future improvements proposed in the Fiesta Island Amendment.” This diminishes the usefulness of the DPEIR. Ideally, it would be good to have an analysis of impacts and mitigations for issues that will occur during multiple projects on the island, so that these analyses do not have to be repeated for every project.

**“Without even preliminary implementation plans to be analyzed, how can any project tier off this document? Does this not defer analysis and mitigation to all future projects? For example, every Project tiering off this DPEIR will have to present a mitigation plan for impacts to sensitive species, as well as a greenhouse gas analysis. Wouldn’t it be simpler and cheaper to put the analyses in the DPEIR, so that every subsequent project doesn’t have to repeat the analyses?**

## 2. Response to Comments

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### POTENTIAL SOLUTIONS

Fortunately, these problems can be mostly fixed with some simple changes, all focused on avoiding impacts as a fundamental principle:

- Map the island’s disturbed vegetation to note where native shrubs, especially those with good wildlife habitat value, are located. Redesign the project’s landscaping and sand management areas to focus on the most disturbed lands and to avoid wildlife habitat and sensitive species.
- Exclude the Master Plan’s plant palettes for coastal strand and coastal sage scrub plant from Fiesta Island. Use locally native plants only, and create planting palettes based on species that already grow on the island.
- Make preserving wildlife habitat across the island a primary mitigation measure and project design goal.
- Where the current Project proposes simply destroying sensitive native plants (CRPR list 1, 2, 3, or 4), instead of destructively removing the native plants, instead implement a weeding plan with minimal planting of native plants.
- If possible, use nursery stock grown following the CNPS protocol, to limit the spread of Phytophthora on the island.
- Work with local CNPSSD, San Diego Audubon, and other volunteer groups to weed on the island, with the express goal of preserving the sensitive rare plants and removing problematic non-native plants like the “foxtail” bromes (*Bromus diandrus* and *Bromus madritensis*) and others.
- Forego permitting impacts from projects on Fiesta Island, when those projects have not even reached the design stage.

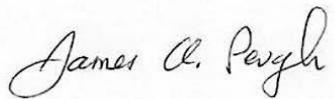
AY-21

Thank you for taking these comments. Please keep CNPSSD informed of all developments with this project and associated documents and meetings, at [conservation@cnpsd.org](mailto:conservation@cnpsd.org) and [franklandis03@yahoo.com](mailto:franklandis03@yahoo.com). Please also keep SDAS informed of the progress at [meyer@sandiegoaudubon.org](mailto:meyer@sandiegoaudubon.org) and [peugh@cox.net](mailto:peugh@cox.net).

Sincerely,



Frank Landis, PhD  
Conservation Chair  
California Native Plant Society, San Diego Chapter



James A. Peugh  
Conservation Chair  
San Diego Audubon Society

## 2. Response to Comments

### AY. Response to Comments from San Diego Chapter CNPSSD and San Diego Audubon Society, dated January 21, 2019.

- AY-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- AY-2 The Draft PEIR evaluated the potential environmental impacts from development that could occur under the Amendment. The PEIR conservatively assumed that the proposed project would recontour much of the Island to support the planned uses. The act of recontouring the Island would result in the removal of existing vegetation. To address such impacts, any future improvements would be required to prepare a detailed mitigation plan for biological resources on the Island pursuant to Mitigation Measure BIO-1. Wetlands impacts are discussed in Impact 5.2-3 and addressed through Mitigation Measure BIO-6. See also Section 2.1 of the FEIR, *Master Response for Program EIR*.
- AY-3 See Response AY-2, above, and Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AY-4 See Response AY-2, above. Per Mitigation Measure BIO-1, prior to any construction or grading activities, the City shall prepare a mitigation plan in accordance with the requirements of the City's Biology Guidelines, MSCP Subarea Plan, and Land Use Adjacency Guidelines.
- AY-5 The commenter is correct in that there is a calculation error in Table 2-4 of the PEIR. See Chapter 3, *Revisions to the Draft PEIR*, which resolves the calculation. This calculation does not impact the findings of the PEIR as they relate to biological resources.
- AY-6 Biological mapping was conducted in 2002, and verified during preparation of the PEIR. The nature of biological resources is that they are constantly changing. As construction is not considered as part of the PEIR, more detailed analysis will occur at the time plans are developed. See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AY-7 The Least Tern sites will not be affected by the proposed project as shown in the project description and described throughout the PEIR.
- AY-8 See Response AY-2, above. Per Mitigation Measure BIO-1, prior to any construction or grading activities, the City shall prepare a mitigation plan in accordance with the requirements of the City's Biology Guidelines, MSCP Subarea Plan, and Land Use Adjacency Guidelines. The mitigation plan for the development of park features near the least tern areas would address the removal of invasive plants and the protection of the least tern habitat.

## 2. Response to Comments

- AY-9 Landscaping guidelines of the Mission Bay Master Plan may apply, or may be modified by future project proposals. See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AY-10 See response to comment AY-9.
- AY-11 See response to comment AY-9.
- AY-12 There are no design documents or planting plans for the island or the dog park area. Mitigation Measure BIO-1 requires a habitat / sensitive plant species survey prior to any ground disturbance. Foxtails are not a plant of environmental concern for CEQA, and the management or removal of them from the island would be part of a future development plan. See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AY-13 See response to comment AY-9.
- AY-14 See Response AY-2, above. Per Mitigation Measure BIO-1, prior to any construction or grading activities, the City shall prepare a mitigation plan in accordance with the requirements of the City's Biology Guidelines, MSCP Subarea Plan, and Land Use Adjacency Guidelines.
- AY-15 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AY-16 There are no commercial areas on the island, nor are any proposed with the project. See Chapter 3, *Project Description*, of the PEIR. Future improvements may result in noise associated with events on the island; however, the existing island also generates noise during special events. Isolated in Mission Bay, with few sensitive receptors and no adjacent residential uses, the PEIR concluded that noise impacts would be less than significant. See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AY-17 Fiesta Island was not considered a wildlife corridor because it is isolated from the mainland with a single access through a paved causeway. Avian species are considered in the PEIR in Section 5.2, *Biological Resources*. Mitigation measures have been included in the PEIR to ensure that future construction does not impact migratory birds.
- AY-18 As an existing public open space area, the proposed project is not changing the existing land uses. Greenhouse gas emissions for this amendment are evaluated in Section 5.4 of

## 2. Response to Comments

the PEIR. The proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.

- AY-19 See response to comment AY-18.
- AY-20 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- AY-21 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AZ – Nancy Seelert (1 page)

**From:** Nancy Seelert  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** PROJECT NAME: Mission Bay Park Master Plan – Fiesta Island Amendment PROJECT No.: 562189 / SCH No. 2017051034  
**Date:** Monday, January 21, 2019 4:38:24 PM

---

I am writing to you for my support in Plan A of this project. The park should not be only for dogs. This park belongs to the city and it's people.

As an outrigger paddler, on the San Diego Outrigger Canoe Club, man- powered watercraft are loosing areas to launch craft in accessible areas. 6 man outrigger canoes weigh 400lbs+ and they are carried to the water by the team. One man canoes obviously weigh less but are an awkward 20+ feet long with similar weight. Stand up paddle boarders also have a heavy board.

We deserve the right, as tax paying citizens, to have a feasible launch and storage facility, as well as all the fabulous other amenities that you have planned for this area.

A road is not going to take away from the dog area but provide access to the water for San Diegans for generations to come.

Regards,  
Nancy Seelert

[Sent from Yahoo Mail on Android](#)

AZ-1

## 2. Response to Comments

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## 2. Response to Comments

**AZ. Response to Comments from Nancy Seelert, dated January 21, 2019.**

AZ-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER B – Peter Holmes (1 page)

**From:** Peter Holmes  
**To:** [Malone, Rebecca](#)  
**Subject:** Re: DRAFT PEIR – Mission Bay Park Master Plan Fiesta Island Amendment / Project No. 562189 - Public Notice  
Date December 7, 2018  
**Date:** Friday, December 07, 2018 10:16:05 AM

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B-1 | Will this impact the amount land available for the dog area? And speaking generally, will this be good or bad for us dog owners?

On Fri, Dec 7, 2018 at 10:09 AM Malone, Rebecca <[RMalone@sandiego.gov](mailto:RMalone@sandiego.gov)> wrote:

**DRAFT PEIR**

Please see the attached public notice for the Draft Program Environmental Impact Report for the Mission Bay Park Master Plan Fiesta Island Amendment that was distributed for public review starting today, December 7, 2018, and ending January 21, 2019.

**Rebecca Malone, AICP**

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## 2. Response to Comments

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## 2. Response to Comments

### **B. Response to Comments from Peter Holmes, dated December 7, 2018.**

B-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER BA – Karen Riggs-Saberton (13 pages)

**From:** KarenRS  
**To:** [PLN Planning/CEQA](#)  
**Cc:** [Karen Riggs-Saberton](#)  
**Subject:** Mission Bay Park Master Plan Fiesta Island Amendment Number 562189  
**Date:** Monday, January 21, 2019 5:08:16 PM

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TOPIC: REVIEW OF AND QUESTIONS FOR THE CITY REGARDING PEIR REVIEW OF FIESTA ISLAND DEVELOPMENT PLAN A ("OPTION A")

Submitted with regards - Karen Riggs-Saberton, Ph.D.

### INTRODUCTION

The current version of the Fiesta Island Development Plan EIR excludes some critical factors from consideration.

BA-1

1. The EIR does not consider that Development Plan A ("Option A") is in blatant disregard of a primary Goal of the Development Plan: Formalization of the boundaries of extant-uses of Fiesta Island.

2. The EIR fails to address the impact of Plan A on five key elements of the extant-use functions of the Fiesta Island Dog Park.

BA-2

- a. Exercise
- b. Relaxation and mental health
- c. Unscheduled recreation
- d. Attracting Tourists!

- e. "Less than perfect body" recreational use of the bay

3. The EIR does not explicitly address the tremendous added-cost to the City if Plan A is implemented. It does implicitly approach the question in numerous phrasing and analysis choices, but a failure of explicit analysis is a critical flaw in the EIR. The EIR also fails to point out that this tremendously disproportionate investment of City revenue provides only duplication of recreational opportunities already available (and predominantly underused) on Mission Bay in return.

BA-3

4. The EIR does not adequately address the effect of amplified noise volume and

BA-4

## 2. Response to Comments

BA-4 CONT'D	conflicts inherent in adoption of Plan A. There is an issue of uncertainty within the Development Plan itself which needs to be clarified by the City. <b><i>I request clarification from the City.</i></b>
BA-5	5. Fiesta Island Development Plan A raises issues of substantial legal and financial concern. Since these issues are implicit in the Development Plan as reviewed as EIR "Option A", but not as reviewed in EIR "Option B", I will present my concerns in light of review of the two EIR options.
BA-6	I want to emphasize some introductory points: <ul style="list-style-type: none"><li>• <b>We lose <i>irreplaceable</i> extant-use space where we can play with our dogs, the only place we can play with our dogs off leash by the bay. This extant recreational use CANNOT go anywhere else!</b></li><li>• <b>Once the remainder of Fiesta Island is gone, what is left in "natural" state for the Fiesta Island Dog Park will will be the ONLY "natural resource" area left on the bay!</b></li><li>• <b>The best shoreline exercise loop in the city is destroyed in Plan A, it is removed entirely. After implementation of the Fiesta Development, whatever remains in the Fiesta Island Dog Park will be the ONLY "natural resource" shoreline loop in the City!</b></li></ul>
BA-7	• <b>Handicapped access to the only accessible "natural resource area on the bay will be decreased by 68% by Plan A.</b>
BA-8	• <b>Plan A is <i>*extraordinarily*</i> expensive: no activity proposed for the 10 acres of developed parkland can be left onto of the current 25 foot cliff! Nor is X miles of road, and extension of water, sewage and electric inexpensive. Commercial quality security systems and staffing/maintenance aren't inexpensive either.</b>
BA-9	• <b>There are serious legal and financial issues surrounding provision and management by the City of a boat storage facility accessible to and on behalf only of a miniscule, select, local set of individuals, in apparent absence of appropriate due process. This needs to be carefully reviewed.</b>
BA-10	<b>SECTION 1: INTENSITY OF EXTANT-USE OF THE FIESTA ISLAND DOG PARK AND SOME NEARBY SIMILAR DEVELOPED PARK AREAS</b> Per EIR 3.2, "The goal for Fiesta Island, as adopted in the Mission Bay Park Master Plan, is

## 2. Response to Comments

for Fiesta Island to be “An area which supports a diversity of regional-serving public and nonprofit recreation and natural resource management and enhancement uses.”

### **Extant-use, and extant-use *intensity***

**Plan A is inconsistent with the goal of “natural resource management and enhancement use” within the Fiesta Island Dog Park area of Fiesta Island - especially if *intensity of use* is taken into consideration.** The following data is presented to underscore the intensity of the extant-use of the Fiesta Island Dog Park. In addition, **this data underscores *why* Fiesta Island Dog Park Development Plan A has resulted in such outrage among the community, an outrage adequate to have built a 16,000 member non-profit, volunteer organization from a starting point of zero.**

BA-10  
CONTD

Authors note: My initial plan Saturday (1/19/19) was to go the Fiesta Island Dog Park to chill out after a event downtown. But the wonderfully quantifiable situation I encountered when I arrived on Fiesta Island lead to the collection of the data presented here. While this particular data is a frame-shot, I have lived on Crown Point for 19 years and I commute daily along Crown Point Drive, with full view of the bay and the Fiesta Island Dog Park main (north) parking area. *The data presented here is fully consistent with all observations accrued across time.* - Karen Riggs-Saberton, Ph.D. (Biological Chemistry, UCLA School of Medicine)

Date: Jan 19, 2019

Day: Saturday

Weather: temperature 70 degrees, sunny

Start data collection 2:20 PM (Fiesta Island Dog Park main (east) parking area)

End data collection 3:30 PM(Crown Point)

BA-11

### **LAND AND MARINE SPACE UTILIZATION PARAMETERS**

#### **Fiesta Island Dog Park area**

- Number of cars<sup>1</sup> in the Fiesta Island Dog Park main (north) parking lot: 110  
(number of cars that arrived during count: 5)
- Cars parked along the East fence access areas of the Fiesta Island Dog Park: 47
- Groups counted not using the Dog Park - 1 (radio-cars, central area)
- Children counted: 11-15 (approx, by size), ages: infant-teen, association: family groups

#### **Other Fiesta Island areas**

- Number of cars parked on the remaining (inner-loop) road: 78

## 2. Response to Comments

BA-11  
CONT'D

- Children counted: 2
  - Groups *without* dog(s) counted: 4
  - Un-represented extant-use activities counted: 4 (fishing:10-20, "shrimping": 2-3, equestrian: two trailers, trike-sailing: 1 (central area))
  - Of special note - Plan A: Outrigger canoes in storage on the Youth Aquatic Center beach: 4. Number usually in storage at this location: 4
- Aquatic areas, both main and side bay<sup>2</sup>**
- Motorized boats (main bay): 3
  - Non-motorized boats: 1 (kayak)
  - Boats using Hidden Anchorage area (Fiesta Island): 0
  - Jet-skis in "extant use" areas (Fiesta Island, north and south of access causeway)
    - South of causeway (Fiesta Island Dog Park side): 0
    - North of causeway (Freeway side): (organized meet-up approx. 8-10 units present)
- South Shores Boating Facility**
- Number of cars parked near boat facility(most with trailers): 21
  - Number of cars in other parking lot areas: 27 (nearly all at walking/biking trailhead)
- Crown Point area of Mission Bay Park**
- Number of cars parked: 84
  - Children using designated "children's" recreational area: (3 on arrival, 0 on departure)
  - *Number of people playing with their dogs (illegally) in the park: 5*

**TAKE HOME ANALYSIS:**

There were more cars parked JUST at the Fiesta Island Dog Park *alone* than there was composite use of any other area of Fiesta Island, the South Shores parking and boat

## 2. Response to Comments

BA-11  
CONTD

launch facility, or the Crown Point area of Mission Bay Park. Distribution of recreational use intensity in some relative proportion to number of cars parked is inferred (there is no public-transit access to any of these locations). **Recreational use of the Fiesta Island Dog Park was by far the most popular use on the bay!**

<sup>1</sup> car numbers are by direct count, exiting personal vehicle as necessary

<sup>2</sup> All parts of the bay are visible from Fiesta Island up to the Ingram Drive overpasses.

### SECTION 2: LOSS OF CURRENT PRECIOUS RESOURCES AND ACCESS

The EIR fails to address the impact of Plan A on some key elements of the extant-use functions of the Fiesta Island Dog Park.

1. Exercise, relaxation and mental health
2. Handicapped access
3. "Anyone, anywhere" recreational use of the bay

Exercise is my favorite thing to do on the bay. I walk the shoreline loop at the Fiesta Island Dog Park (after work, no dog) 2-4 days/week. I am not alone! I routinely meet joggers and some mountain-bikers also here to exercise after work (usually we come off work & without dogs). We come to exercise, to relax and to chill out. I go home to a handicapped-care situation, so I need to switch gears after work. The bikers come to use the rough terrain (these are mountain bikes) and to get away from the cars that are a threat most places. I assume others have their own reasons. Among the best, this is the only "natural resource" area which has a good 2-3 mile walk closer than Mission Trails Regional Park.

Destroying the shore-line loop and rerouting (and shortening!) the inner loop to provide "just one more" walk along a road... these are the parts of Plan A that most profoundly disturb me.

Of I come on weekends with my dog, **there is no other shoreline in the entire City of San Diego where I can safely go!** To be quite precise, the only other legal access in the city, during normal recreation hours, is at Dog Beach, which is not fenced, and I've always been a bit afraid of the waves. It can also become highly impacted during peak times (you are, after all, funneling the entire City of San Diego into 900 feet to play with their dogs!), and that isn't the best situation when rough water, excited dogs and no fencing comes into play. When I go to Fiesta Island Dog Park on the weekends, sometimes it is to exercise, sometimes it is to play, and sometimes it is just to relax and be quite.

Fiesta Island Dog Park is the only place on the bay I can get more than a few feet away from roads and the sound of traffic. **It is my rest and relaxation place - I use it as much**

BA-12

## 2. Response to Comments

**or more for that than for exercise.** The Fiesta Island Dog Park is **QUIET!** It has dog noises and human noises, of course, and you can hear the people playing at Sea World, but **there are no cars and there are no radios!!** You can sit under the tree and just be quiet. Or you can walk out to the point and be very quiet, sit and watch everyone come and go. “No cars”, of course, is destroyed for the whole Fiesta Island Dog Park by Plan A. And the “no radios” - already lost to “special event permits” all along the Mission Bay Boardwalk, will be lost to the “special events hillside amphitheater” and other Plan A “special events” development - and unlikely in any event to survive developed-park use of what is currently almost the only, peaceful “natural resource” area part of the bay. **Once the remainder of Fiesta Island is gone, what is left in “natural” state for the Fiesta Island Dog Park will be the ONLY “natural resource” area left on the bay!**

The EIR fails to address any impact of Plan A on the popular extant-use of Fiesta Island Dog Park as an exercise area. Plan A destroys the best, longest and most popular exercise loop - the shoreline loop - the loop that runs along the both shores contained within the extant fenced area. **The shoreline loop is removed entirely.** Shoreline along what path remains is reduced from 4072 feet to 1909 feet (Google maps + pedometer), a loss of 68% of the shoreline. This is the part I will miss the most under Plan A: my usual exercise route is to walk the shore-line loop, a distance of 2.5-3 miles or so, a sand walk, so a great workout and wonderful fun. It is also beautiful, that walk is the only undeveloped shoreline walk, the only “natural space” shoreline walk (and “natural space” walk of that length at all closer than Mission Trails Regional Park past Kaiser Permanente Zion).

The hard-packed inner loop is also deeply affected. The Fiesta Island inner-loop path has very much a mixed-use: it is used for extensively for exercise, and it is a wonderful relaxation walk. I will address the impact of Plan A on recreation and relaxation uses together for the inner loop. This is where I walk when I visit with family and friends, or take out-of-town visitors to play. Used for exercise, this is the path most of the bikers and some of the joggers use (joggers are also abundant on the shoreline loop).

### **Loss of Handicapped access to the only remaining “natural resource” area on the bay**

Handicapped access to the only accessible “natural resource area on the bay **will decrease by 68% under Plan A.** Currently, all areas of the inner loop can be readily accessed by mobility scooter or motorized wheelchair, and by “adaptive” childrens stroller-chairs. Wheelchair access is possible, but requires substantial effort. My father in law used a mobility scooter - for him, going to Fiesta Island Dog Park and around the inner loop with myself, my husband, and my dogs was by far his favorite thing to do when he visited from Indiana. Sure, we could (and did) go along the bay, but it was just sidewalk, and --- well, the dogs could not go!

My husband uses a mobility scooter now and we spend many pleasant hours going around

BA-12  
CONT'D

BA-13

## 2. Response to Comments

BA-13  
CONTD

the inner loop, and playing with our dogs (and everyone else's dogs!) on the bench underneath the Eucalyptus tree. There are not many "natural space" areas you can get to in San Diego; in fact I can think of no place else in San Diego where an electric scooter can get away from the roads and city noise at the moment and simply enjoy a "natural resource" area, I don't believe there is one! The next closest "natural space" area, Mission Trails Park, trails has no such trails.

There for many years there was an electric wheelchair user who brought her service dog to run free and play around the inner loop. You will occasionally see mobility impaired children in the "street-style" wheelchairs there. I have three friends who can no longer walk their dogs on leash due to mobility issues - every single one of them takes their dogs to the Fiesta Island Dog Park for exercise and recreation, human and dog both!

**Loss of unreserved, free access for people of all ages, economic levels, sources of origin, etc!.**

***I sincerely hope construction, staffing, management and ongoing utilities and maintenance of the boat storage facility is not going to be provided to a miniscule group of local boat owners for free!*** The way the Fiesta Island Dog Park is now, any one who wants to go the the Fiesta Island Dog Park can go. There are no reservations required, no planning needed. You don't need a permit, you don't need a sitter. You don't need a dog sitter! You can take your furry friend! Fiesta Island is the only place in San Diego you can do this! Entrance is free, there is no credit check, no dress code, no reason to even guess a person's economic status. A person can be healthy, they can be overweight, they can be any color, and creed, and race any origin. People can take their dogs with them, or not, any time, as they see fit. I've met people from as far away as Germany, and as local as Chula Vista, El Cajon, Jamul and Escondido. I've met people from all races, creeds, and walks of life. Sure, they can still come use the 909 feet of shoreline remaining. But Plan A turns the Fiesta Island Dog Park from the one-of-a-kind, outstanding jewell of San Diego - into "just another developed park" - Right now Fiesta Island is labeled on Google Maps as "Fiesta Island Park: Peninsula for picnics, parties, & pooches". Under Plan A, it it becomes "just another park" on the already extant (and woefully underused - 20-30% at Crown Point nearly any day of the year) "pretty-but-useless" developed grasslands" that already comprise the remaining 23 miles of shoreline around the bay. Face it, if you are not going to sit on it for a picnic (or throw a ball for your dog - illegal!) what is the "recreational value" of grass??

BA-14

### **We lose the trees**

I know, not an EIR issue. Except maybe impact on community, and perhaps loss of a wonderful mental health extant-use. This is THE PLACE at the Fiesta Island Dog Park to relax, hang-out, meet friends, enjoy your dogs, enjoy their dogs! And read. And study. And picnic (OK, carefully!) And go with your husband when it is hot outside...

BA-15

**After loss of the shoreline exercise loop, loss of trees will be my most heartfelt loss.**

**SECTION 3: OUTRAGEOUS EXPENSE TO THE CITY, RETURNING ONLY EXACT**

## 2. Response to Comments

### DUPLICATION OF RECREATIONAL RESOURCES ALREADY AVAILABLE (MOSTLY UNDERUSED) ON THE BAY

Plan A implementation comes as exorbitant cost to the City.

Expenditure necessary to implement Development Plan A (in excess of Plan B)

1.
  - Reduction in ground-height: 25' to 10-13'
    - EIR Area difference Plan A: 10 acres
    - EIR Current Height: 25 foot - further described as on a "small cliff" (EIR 5.5.2), (also <http://elevation.maplogs.com>)
    - Square feet of sand (and sludge?) composite to remove to Plan A to a its stated elevation: 480,400 cubic yards - **34,300 dump truck loads!** (a dump truck holds 14 cubic yards)
2. Road construction: 0.5 miles
3. Fencing construction (wood+wire construction) (and associated maintenance): 0.5 miles
4. Required utilities extension: 0.5 miles (water, sewer, and electric)
5. Commercial-level security system (purchase, connections, and and associated maintenance)
6. Ongoing expenses for facilities staffing, maintenance, and management (see 1964e separate discussion and questions, "legal and financial concerns")

#### QUESTIONS:

- The area of substrate to be removed under Plan A was used as settling beds for the sewage sludge, from 1964 until sometime after 1995 (<http://articles.latimes.com/1989-02-17>). Has the city determined that this legally allowed to distribute the removed substrate to the sand areas around the bay? Where can the public see record of the scientific basis for this determination? Or, if not otherwise

BA-16

BA-17

## 2. Response to Comments

BA-17  
CONT'D

addressed, will the City then need to move the substrate entirely off-site?

BA-18

- Does the City have any estimates as to the cost of the soil removal, road and fence construction, and extension of the requisite utilities? Where can the public view these estimates?

BA-19

- The EIR provides that “The General Plan Public Facilities Element includes several policies that address financing of public facilities and specifies that IFS should be completed concurrent with preparation of Community Plan updates, should set community-level priorities for facility financing, and ensure new development pays its proportional fairshare of public facilities costs through payment of DIFs”. (EIR 4.8) What price per square foot rental space does the city estimate will be needed to offset the cost of facilities construction? Over what rental time-frame? Price per square foot need be charged in rental to achieve the Development Plan goal of positive income production? Or what alternative plans has the City established to ensure the boat storage building (a ‘facility’ under the EIR definition) covers its costs?

IN CONSIDERATION OF THESE EXPENSES, REFERENCE BACK TO SECTION 1:  
INTENSITY OF EXTANT-USE OF FIESTA ISLAND DOG PARK.

### **SECTION 4: A CRITICAL ISSUE NOT ADDRESSED IN THE EIR - NOISE, AMPLIFIED SOUND, AND SOUND CONFLICTS**

BA-20

I am requesting clarification from the City regarding the planned construction of and use of amplified sound production at the “Special Events” areas involved in the Development Plan. Since the Special Events Hillside Amphitheater contained in Plan A is of the greatest concern, I will confine my questions of the EIRs sufficiency in this area to that venue. I LIVE ON CROWN POINT, EAST SIDE. Be aware that **we can hear all amplified sound from the Fiesta Island central sand area on Crown Point and Ski Beach** (between the Ingram Drive overpasses). From the Fiesta Island Dog Park east shore we can hear *words* from special events PA systems at Ski Beach. Music from ski beach can echo over the whole island, and can be loud enough along the east shore to disrupt conversation. We hear human sounds from Sea World at the Fiesta Island Dog Park, especially (and enjoyably) from the excited roller coaster riders, as well as sometimes from the shows. **IF WE CAN HEAR THESE ACTIVITIES AT FIESTA ISLAND - THESE VALUABLE SPECIAL EVENTS VENUES WILL HEAR ANY AMPLIFIED SOUND EMINATING FROM THE CURRENT FIESTA ISLAND DOG PARK AREA WITH EQUAL CLARITY.** The water of the bay offers very little sound-dampening effect: at times it seems to amplify. *Plan A - in the only version that includes the boat storage facility - also* includes a “Special Events Hillside Amphitheater” between the road and the boundaries of the off-leash area. The Development Plan version shows a Special Events sand arena (“over-the-line” area, undisputed), and a Public Amphether just west of the causeway-east Jet Ski area, also

## 2. Response to Comments

BA-20  
CONTD

undisputed). Noise production from the Special Events sand arena is addressed by the current EIR. However, I have a critical question for the City: Is the construction of the two Special Event Amphitheatres facilities still part of the the current Development Plan? The current EIR is understood by the interested parties to innately authorize construction of the Plan A boat storage area without further review. *The version of Plan A that includes this boat storage facility is \*also\* the version of Plan A which incorporates the Special Events Hillside Amphitheater.* This Special Events Hillside Amphitheater is depicted as a raised hillside with seating around a central display area, curved to point over the bay. does approval of this EIR also then permit construction of the the Special Events Hillside Amphetheater, and clearly intended in its design to support amplified-sound-oriented activities. The EIR as currently presented fails to consider any such noise production in its analysis. If Plan A still includes the Special Events Hillside Amphitheater, the EIR itself, then, fails to consider a key element of the Plan A development and the EIR analysis of Plan A is deficient and incomplete. Has the Special Events Hillside Amphitheater been removed from Plan A? Where can I review this revised plan and confirm its formal removal?

BA-21

Otherwise I ask the City to please answer the following questions - URGENTLY!:

1. Will use of amplified sound be allowed at any of the Special Event facilities (all 3).
2. Will use of amplified sound require permitting (see as reference San Diego Waterfront Park regulations "").
3. Does the City intend to issue such permits?
4. Is there a limit on the number of such permits the City will issue?
5. Are these limits on a per-venue to the number of permits the city will issue?
6. What provisions has the City put in place to prevent amplified sound conflicts between the Special Events venues on Fiesta Island, and between the Fiesta Island special events and the various Special Events venues in this area of Mission Bay, especially the very popular Special Events venues of Ski Beach and Crown Point?

**SECTION 5: LEGAL, LIABILITY, EQUITY AND FINANCIAL CONCERNS ABOUT PLAN A**  
**LEGAL, LIABILITY, EQUITY AND FINANCIAL CONCERNS ABOUT PLAN A**  
**Legal concerns regarding equitable and transparent allocation of access to publicly**

## 2. Response to Comments

**funded facilities, and liability and and other financial concerns affecting the City.**

BA-22

At the January 8, 2019 meeting of the Mission Bay Park Committee, the designated Speaker for the paddlers called out the City for having not directly contacted the paddlers and notified them of the upcoming meeting, accusing the City of having not provided them with the hearing's upcoming dates and times. *This information was made public within all legally mandated parameters per standard City practice via standard established City channels.* The Fiesta Island Dog Owners association, in accordance with appropriate protocol, acquired and distributed this information to their members. The Speaker's complaint to the Committee was, in point of fact, that he, "had to find out this information from the Fiesta Island Dog Owners association facebook site."

Which raises the following DISTURBING concern:

***What else do the paddlers expect the City to give them?*** I had previously gone along with the general opinion of many FIDO members, I was OK with the city supply a location for boat storage to the paddlers, as long as they didn't build a road through the Fiesta Island Dog Park. I now have some SERIOUS questions as to what the City of San Diego may be getting itself into.

BA-23

1.

Do the paddlers expect the City to staff the Plan A boat storage building? Paddlers generally row early in the day or late in the evening, by reason of age most work during the day, has this been taken into account in such hours of staffing/hours of access discussions?. Do they expect the city to cover all utility costs? What legal documentation of any such formal agreement exists?

BA-24

2.

I can think of no other boat storage venues on Mission Bay which are not rented to a secondary, legal entity as lessee. Does there exist at minimum a fully executed Memorandum of Understanding with such a legal entity as regards assumption of responsibility for daily operation of any Plan A boat storage building and facility? With whom is the MOU held? How can the public view this document? I am not aware of the paddlers holding composite status as legal entity. In the absence of legal entity status (and unless otherwise established through appropriate channels) I have substantial doubt as to the paddlers ability (or willingness) to reliably enter into fiscal contract with the City for what will be an \*expensive\* facility.

BA-25

3.

If the City does not hold Memorandum of Understanding for lease to an extant legal entity, do the paddlers expect the City to provide, manage and staff this facility for them for free? Should Plan A be selected for implementation, will the City then in addition be obligated for maintenance, upkeep and user - access management for the Plan A boat storage facility?

4.

## 2. Response to Comments

BA-26

The paddlers seem to think they have been given priority access to the Plan A boat storage facility if constructed. Does there exist a legal agreement with the City establishing such priority access as point of law? Upon what legal basis was such priority access conferred? What alternative methods of equitable allocation of use for this facility were considered by the City prior to implementation of this access plan? How can the public view such agreement? How can the public review the documentation of method and means by which the final agreement was selected and approved? *Based on the paddlers statements of demand in excess of supply, this should be a coveted location. If no extant agreement exists, how does the City plan to prioritize access and provide equitable access to this expensive resource?*

BA-27

### **Further concerns regarding City liability for theft or vandalism**

The sculling boats used by many of the paddlers are extremely expensive. A used 8-man sculling boat costs between 10,000 to 25,000 dollars. Will the City be liable for theft or damage to these boats? How long would, say, a difficulty with the fence need to go unaddressed before the City became liable? The proposed Plan A boat storage facility is located in a remote location with no direct visibility except from the bay. It is directly across from an isolated location from which a boat could be taken off-site, with little threat of detection. The EIR provides average police response times for non-life threatening issues as 44 minutes.

### **CLOSING ARGUMENTS**

BA-28

In light of my serious reservations about the City getting in to the boat storage business, I'm not sure whether asking the next glaringly obvious question has value. But just so that I understand the City's viewpoint, given the multiple issues with the Plan A boat storage location, has the City considered alternative sites for boat storage on Fiesta Island? If not, why not? The paddlers have always refused to meet with the Fiesta Island Dog Owners association, but has the City asked the paddlers to propose alternatives? How can the public view the alternatives they provided?

BA-29

I have a paddler's perspective to provide on this issue: In addition to playing at Fiesta Island Dog Park (with or without my dog), *my next favorite thing to do on the bay is play with my kayak*. Usually I launch from the north end of Crown Point, as do numerous other non-motorized watercraft, including, ironically, a group of sculling rowers who trailer in sometimes. This launch area is located just north of the Children's swim area, and is protected from the faster traffic on the bay by the same traffic marker buoys that protect the children. These marker buoys extend (depending on tide) about 150-200 feet out into the bay, and the parking extends up to the shoreline, making this a perfect place to launch. From the north end of Crown Point, I and the majority of the other non-motorized watercraft users travel South along the coastline, where traffic marker buoys continue to offer clarity as to where the fast and slower watercraft are supposed to be.

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BA-29  
CONT'D

I've launched my kayak from the north end of Fiesta Island Dog Park (the parking area) (in particular, some sweet person there will almost always help me get it back in my car. I'm just one person - they are heavy!) Most of the year - and I'd say all but some peak times during the summer months I've encountered no issues of safety. There is, quite simply, no other major traffic on the bay - Saturday's count of 3 boats was not unusual. I must agree with some of the safety analysis of this area though - during the height of summer - at some peak times of day (11-4 pm or so), -- *in the absence of appropriate traffic marker buoys* this area can become dangerous (it can, in fact, be unsafe for the dogs. No matter which Fiesta Island Development Plan is selected I would suggest traffic marker buoys be installed along the Fiesta Island east shore). My experience with equally impacted (identical) traffic on the Crown Point side of the bay, however, would indicate that installation of traffic marker buoys, long established to separate speeds of traffic on the South side of the bay, would similarly act to make passage along the east side of Fiesta Island safe .

The most widely accepted alternative site for boat storage on Fiesta Island (including by some to-remain-anonymous paddlers) is not a site I had ever launched. At the moment it is too far from the road to be used easily, but there will be parking installed here during development by either plan, making it almost the perfect site to launch. Both by Google Maps measure of distance, and by my (long since calibrated) pedometer, I find there to be 700 feet or somewhat more (tide-dependent) distance between the extant traffic marker buoys that flank this area to each side (the west side being set by the nearest Hidden Anchorage buoy, and the east by the nearest buoy marking the (causeway-west) Jet Ski area boundary).

Addition of safety margin, then, deemed sufficient to protect the children's swim area at Crown Point, *from the extant safe-travel buoys*, still leaves 400 feet of shoreline from which non-motorized craft can be safely launched. Note, *the storage facility itself need not fully fit here* - safety seems to be a big concern, so these 400 feet comprise only the *safe launch* zona available - based on clearances deemed fit for children's safety on the other side of the bay.

In closing, I continue to maintain that *I trailer my kayak to launch*. Everyone I know trailers their watercraft. *This is simply the way most boat storage in San Diego is done*: you store your craft off-site, and you take it to the bay to launch.

I question whether Plan A should ever have been considered in the first place. Given the existence now of a second option: Fiesta Island Development Plan A should be soundly rejected - **the City should accept Fiesta Island Development Plan B.**

## 2. Response to Comments

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## 2. Response to Comments

### BA. Response to Comments Karen Riggs-Saberton, dated January 21, 2019.

- BA-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-2 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-3 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-4 Section 5.7, *Noise*, includes analysis of the potential noise impacts from construction and operation of the Project. Noise impacts from both Option A and Option B are less than significant.
- BA-5 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-6 Please see Chapter 3, *Project Description*, Table 3-2, which provides a comparison of proposed changes and identifies other natural areas of the island including habitat and least tern preserves, coastal landscape, and wetlands habitat.
- BA-7 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-8 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-9 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-10 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-11 The City appreciates the efforts made by the commenter. However, observations from a single day do not constitute the average operations seasonally or annually, nor do they provide a comparison of weekday versus weekend conditions.
- BA-12 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-13 The comment does not address the adequacy of the PEIR as it relates to CEQA. As a public agency all future improvements would be required to comply with the American With Disabilities Act (ADA). Compliance with the ADA is not a CEQA issue. The project does not propose the removal of trees. See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- BA-14 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-15 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-16 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.

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- BA-17 As described in Impact 5.2-6, in Section 5.2, *Biological Resources*, as part of the City’s MS4 requirements, developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials, and other elements that might degrade or harm the natural environment or ecosystems processes. In addition, in accordance with the CEQA Guidelines, future development will be analyzed for its potential for impacts related to hazardous materials release.
- BA-18 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- BA-19 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-20 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review. Special events that would draw large crowds or could noticeably contribute to the ambient noise environment would be subject to the City’s Noise Element Policy NE-H.1 of the General Plan, and are required to comply with the City’s Special Events Ordinance.
- BA-21 See response to BA-20, above.
- BA-22 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-23 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-24 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-25 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-26 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-27 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BA-28 The comment does not address the adequacy of the PEIR as it relates to CEQA. Project alternatives were analyzed in Chapter 9, *Alternatives to the Proposed Project*, of the PEIR.
- BA-29 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

LETTER BB – Christine Thomas (1 page)

**From:** christine thomas  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** PROJECT NAME: Mission Bay Park Master Plan – Fiesta Island Amendment PROJECT No.: 562189 / SCH No. 2017051034  
**Date:** Monday, January 21, 2019 5:39:17 PM

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Hello,

BB-1

My name is Christine Thomas, and I am a San Diego resident. I am a dog owner and an avid paddler, and I am an advocate for Option A of the above mentioned project. I have a Golden Retriever, Teeje, and a German Shepard, Mollie. We enjoy Fiesta Island on a regular basis. I am very concerned for the future of the paddling community here in San Diego once our canoe clubs lose the land we currently have. I have reviewed the options, and Fiesta Island is the best option. We need direct access to the ocean, without obstructions or concerns about when we can launch our canoes due to tides etc. Given the large area of the proposed off-leash area, I don't see any reason why reducing the area by 7 acres would be an issue for anyone. I certainly know that my dogs won't know the difference. I believe we can share the area so ALL residents of San Diego can get utilization of the limited space we have here on the Bay. I support Option A.

Thank you,  
Christine Thomas  
[REDACTED]  
La Mesa, CA 91942  
[REDACTED]

## 2. Response to Comments

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## 2. Response to Comments

### **BB. Response to Comments from Christine Thomas, dated January 21, 2019.**

BB-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER BC – Susan Juhl (2 pages)

**From:** Susan Juhl  
**To:** [PLN\\_PlanningCEOA](#)  
**Subject:** Mission Bay Park Master Plan Fiesta Island Amendment; Project Number: 562189/SCH No. 2017051034  
**Date:** Monday, January 21, 2019 6:09:47 PM

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Dear Ms. Malone,

I've been a resident (and taxpayer) of San Diego County for more than 20 years. The military brought me here, but the people, the weather, opportunities, and options for indoor and outdoor activities that San Diego has to offer have kept me here. One of those activities is outrigger paddling. Since I started paddling in 2000, there have been no clubs in San Diego County with dedicated space. We have had to lease space from others, which has been a perpetually tenuous and costly endeavor.

I support Fiesta Island **Option A** over Option B because Option A is most aligned to the Mission Bay Master Plan.

Option A:

- <!--[if !supportLists]-->• <!--[endif]-->Makes Fiesta Island available to the largest number of users/communities: swimmers, families, residents who enjoy being near the water, non-motorized watercraft users (kayakers, rowers, SUPers, paddleboarders, dragon boaters, various canoe paddlers, etc.) AND dog owners
- <!--[if !supportLists]-->• <!--[endif]-->Provides ADA shore access, a plaza, non-motorized boat storage, beach watercraft storage areas, and shore launching for non-motorized watercraft
- <!--[if !supportLists]-->• <!--[endif]-->Prioritizes San Diegans over dogs
- <!--[if !supportLists]-->• <!--[endif]-->Is the option originally proposed in the Fiesta Island Amendment
- <!--[if !supportLists]-->• <!--[endif]-->Totals only 7 acres, which is 7.6% of the Southwest Subarea, leaving the remaining 85 acres for a single user – dog owners (I personally feel the 92 acres should be divided up more fairly than even Option A allows – with more space allocated to the larger number of users. There are 17 off-leash dog parks in the City of San Diego alone, including Dog Beach, one of which is only 4 miles from Fiesta Island – and *zero* dedicated spaces for outrigger canoe clubs. There are two addition dog beaches in Coronado and Del Mar. Owners can walk their dogs in more places in the City/County by far than non-motorized watercraft operators can safely launch vessels.)
- <!--[if !supportLists]-->• <!--[endif]-->Would provide the only permanent site on all of Mission Bay that would enable outrigger paddling clubs to store equipment, have a safe water access to flat water for canoers, rowers, and kayakers and quick ocean access for outrigger paddlers (Mariners Point, South Shores, and Spanish Landing do not accommodate those aspects in aggregate,

BC-1

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BC-1 CONT'D	<p>making Fiesta Island the best option)</p> <ul style="list-style-type: none"><li>• Provides the beach access that is required to operate non-motorized watercraft and to swim (beach access not required for dogs, but is available at the County's three additional dog beaches)</li><li>• Provides tangible amenities that will be available to residents as a result of "sunshine taxes"</li><li>• Brings a much larger demographic to the area to spend money on a consistent basis</li><li>• Supporters are willing to share – why aren't the Option B supporters? We're asking for 500 linear feet of 2 miles of beach access for a regional group of aquatic users.</li></ul>
BC-2	<p>I have been a dog and cat owner all my life; I love dogs and feel there is room for them on Fiesta Island, but not at the expense of a much larger group of stakeholders. Option A is the only option that makes sense and is inclusive, another quality that makes me proud to call San Diego home.</p>
	<p>Sincerely, Susan Juhl</p>

## 2. Response to Comments

**BC. Response to Comments from Susan Juhl, dated January 21, 2019.**

- BC-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BC-2 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER BD – Ben Nicholls (1 page)

**From:** Ben Nicholls  
**To:** [PLN\\_PlanningCEQA](#)  
**Cc:** [Kennedy, Seamus](#); [Councilmember Jennifer Campbell](#)  
**Subject:** Mission Bay Park Master Plan Fiesta Island Amendment; Project Number: 562189/SCH No. 2017051034  
**Date:** Monday, January 21, 2019 7:15:41 PM

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To whom it may concern,

I write regarding the MB Master Plan for Fiesta Island.

I have lived in San Diego for over fifteen years. I have served on the PB Planning Group and a wide variety of other neighborhood boards and advocacy groups. Our parks and public spaces are owned by all San Deigns and should be designed in such a way as to promote use for as wide a variety of neighbors as possible. For this reason, I strongly encourage the adoption of Option A as the preferred alternative for the island. Option A makes Fiesta Island available to the largest number of users including swimmers, non-motorized watercraft users (kayakers, rowers, SUPers, paddle-boarders, dragon boaters, various canoe paddlers, etc.) and dog owners.

BD-1

Mission Bay Park is a regional park designated for the use of all in the region as well as visitors to San Diego. Local dog walkers have many options at neighborhood parks throughout the city. It's reasonable to slightly curtail the off-leash area of the island so that a wider variety of uses may occur. My passion, for example, is outrigger canoe paddling. Option A provides for the only permanent site on all of Mission Bay for outrigger paddling clubs to store their equipment and have a safe water access. I acknowledge that Fiesta Island has always been a place for dogs and their owners to enjoy the park and Option A would allow this to continue. It would also allow for other popular uses on the Island.

Thanks for your consideration.

Ben Nicholls

## 2. Response to Comments

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## 2. Response to Comments

### **BD. Response to Comments from Ben Nicholls, dated January 21, 2019.**

BD-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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2. Response to Comments

LETTER BE – DeLano and DeLano (on behalf of FIDO) (9 pages)



**DELANO & DELANO**

January 22, 2019

VIA E-MAIL

Rebecca Malone, Environmental Planner  
City of San Diego Planning Dept.  
9485 Aero Drive, MS 413  
San Diego, CA 92123

Re: Mission Bay Park Master Plan – Fiesta Island Amendment, Project No. 562189 / SCH No. 2017051034 and Fiesta Island Amendment Draft PEIR

Dear City of San Diego:

This letter is submitted on behalf of Fiesta Island Dog Owners (“FIDO”) in connection with the proposed Mission Bay Park Master Plan – Fiesta Island Amendment (“Project”) and the related Draft Environmental Impact Report (“EIR”).

**I. Introduction**

The California Environmental Quality Act (“CEQA”), Pub. Res. Code §§ 21000 – 21177, must be interpreted “so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.” *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.App.3d 247, 259. If an EIR fails to provide agency decision-makers and the public with all relevant information regarding a project that is necessary for informed decision-making and informed public participation, the EIR is legally deficient and the agency’s decision must be set aside. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 712. An EIR is aptly described as the “heart of CEQA.” *Laurel Heights Improvement Assoc. v. University of California* (1988) 47 Cal.3d 376, 392 (quoting CEQA Guidelines § 15003(a); *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.) Its purpose is to inform the public and its responsible officials of the environmental consequences before they are made. *Id.*

CEQA is essentially “an environmental full disclosure statute, and the EIR is the method ... [for] disclosure...” *Rural Landowners Assn. v. City Council* (1983) 143 Cal.App.3d 1013, 1020. As the primary means of fulfilling the intent of CEQA: “An EIR is an ‘environmental ‘alarm bell’ whose purpose is to alert the public and its responsible officials to environmental changes before they have reached the ecological points of no return.” *Laurel Heights, supra*, 47 Cal.3d at 392 (citing *County of Inyo, supra*, 32 Cal.App.3d 795, 810) (emphasis added).

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BE-1

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The Project is an amendment to the Mission Bay Park Master Plan (“Master Plan”) to update land uses for Fiesta Island. EIR at 3-1. The Project proposes to update facilities and alter uses that may have significant impacts to Fiesta Island and Mission Bay Park.

### II. The EIR’s Discussion of the Project Description is Inadequate

The EIR’s discussion of the project description is inadequate. “An accurate, stable and finite project description is the *sine qua non* of an informative and legal sufficient EIR.” *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193.

- The EIR’s Project Description section states: “[T]he proposed project includes elements that are specific to each of the four subareas of Fiesta Island, including two options, Option A and Option B, each with different elements in the Southwest Subarea.” EIR at 3-1. The EIR’s project description discusses various elements of the Project under Option A and Option B including, among other things, “access to a non-motorized boat storage, nearby beach watercraft storage areas, and shore launching area for non-motorized watercrafts” exclusive to Option A. *Id.* at 3-13. However, a different discussion of the Project emerges in the analysis of alternatives. *Id.* at 9-13. There the EIR states: “Option A is the proposed project...” *Id.*
- “[A] curtailed, enigmatic or unstable project description draws a red herring across the path of public input.” *County of Inyo*, 71 Cal.App.3d at 197 – 198. “Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal’s benefit against its environmental costs...” *Id.* at 192. The EIR’s project description is unstable and inadequate. Indeed, the project description and alternative sections’ discussions of the Project reveal two different views of the Project.

### III. The EIR’s Discussion of Project Impacts is Inadequate

“An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences.” CEQA Guidelines § 15151. A review of the sufficiency of an EIR must evaluate “adequacy, completeness and a good-faith effort at full disclosure.” *Berkley Keep Jets of the Bay Committee v. Board of Port Commissioners of the City of Oakland* (2001) 91 Cal.App.4th 1344, 1355 (*Berkley*) (quoting *Rio Vista Farm Bureau Center v. City of Solano* (1992) 5 Cal.App.4th 351,368.)

“A prejudicial abuse of discretion occurs ‘if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process.’” *Berkley, supra*, 91 Cal.App.4th at 1355 (quoting *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 722.) Regarding the sufficiency of an EIR’s analysis, the question is “whether the EIR contained sufficient information about a

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CONT'D

BE-2

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proposed project, the site and surrounding area and the projected environmental impacts arising as a result of the proposed project or activity to allow for an informed decision.” *Id.* at 1355 – 1356.

The EIR fails to adequately analyze impacts to biological resources.

BE-3

- The EIR fails to adequately analyze the potential impacts of both Option A and Option B on biological resources. The EIR discusses the difference between impacts of Option A and Option B on wetland habitats and vegetation. EIR at 5.2-12 and 5.2-19. The EIR fails however, to analyze the differing potential impacts to animals/wildlife under Option A and Option B. This failure deprives the decision makers and the interested public the opportunity to properly understand the potential impacts the Project may have on certain biological resources depending on whether Option A or Option B is selected.

BE-4

- The EIR’s discussion of mitigation measures and analyses of levels of significance after mitigation are inadequate. While such discussion of wetland habitat and vegetation distinguishes between Option A and Option B, the EIR’s relevant discussion of impacts to animals/wildlife does not. Indeed, the EIR claims that after mitigation measures, all biological impacts will be less than significant. EIR at 5.2-11 – 5.2-21. There is inadequate justification for such conclusions, particularly with regard to the Project’s impacts on animals/wildlife. The impacts of the more-intensive Option A are likely to be greater than those of Option B. Yet the EIR’s discussion fails to adequately analyze mitigation measures and significance after mitigation individually for each of Option A and Option B.

BE-5

- The EIR’s discussion of cumulative impacts to biological resources is inadequate. “[A] cumulative impact consists of an impact which is created as a results of the combination of the project evaluated in the EIR together with *other projects* causing related impacts.” CEQA Guidelines §15130(a)(1) (emphasis added). The EIR’s discussion of cumulative impacts only considers impacts to biological resources resulting from future actions, “such as the development of recreational trails and habitat creation, preservation, and restoration activities” completed in accordance with the Project. EIR at 5.2-31 – 5.2-32. The EIR fails to consider the impacts of the Project together with other projects that, when combined, may have a cumulative impact on relevant biological resources.

The EIR fails to adequately analyze geologic and soils impacts.

BE-6

- The EIR acknowledges: “Development of the proposed project would involve ground disturbances on parts of the project site for the construction of proposed improvements and for the creation and enhancement of habitats.” EIR at 5.3-3. The EIR then claims erosion impacts will be less than

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significant after various mitigation measures without providing any adequate discussion. *Id.* at 5.3-4. The EIR provides no analysis of feasibility for any such mitigation measures and lacks justification in making its findings. See *Kings County Farm Bureau, supra*, 221 Cal.App.3d at 728.

BE-7

- Underground on Fiesta Island are various hazardous materials, including sludge, originally capped by five to seven feet of soil. EIR at 8-2. The EIR fails to conduct any analysis of the potential impacts of Option A associated with the construction of elements such as the storage facility and ramp. The EIR considers some health risk impacts due to construction, however, that analysis is limited to emissions related to construction equipment. EIR at 5.1-2. The EIR fails to provide any discussion of potential impacts or risks associated with grading and construction activities, including breaking into the soil cap above the hazardous materials, necessary to implement Option A.
- The geologic conditions analysis is inconsistent with other resources analyses in the EIR and is inadequate. The Project's two options, Option A and Option B, would impact geologic conditions differently. Option A would require additional construction activities to implement its unique elements, yet the EIR fails to analyze geologic and soil impacts from the necessary grading of the embankment and taper from the proposed parking lot to the beach. The EIR's failure to identify the different impacts of Option A and Option B undermines the documents utility an information tool.

BE-8

The EIR fails to adequately analyze impacts to greenhouse gas emissions.

BE-9

- The EIR improperly conducts its GHG impacts analysis comparing hypothetical calculations under buildout of the current Master Plan to estimated GHG impacts under buildout for the Project. EIR at 5.4-4. CEQA specifically provides that an agency must consider the existing conditions. See *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4<sup>th</sup> 310, 322 (describing analysis that used the maximum permitted operational levels as a baseline as “illusory” comparisons that ‘can only mislead the public as to the reality of the impacts and subvert the full consideration of the actual environmental impacts,’ a result at direct odds with CEQA’s intent”). Impacts at “buildout” under the current Master Plan are illusory and should not be used to analyze the potential GHG impacts of the Project. Thus, the EIR’s entire analysis of GHG impacts including consistency with the City’s Climate Action Plan, mitigation measures, and the level of significance after mitigation is inadequate.

The EIR fails to adequately analyze land use impacts.

BE-10

- The EIR fails to analyze potential impacts to parking if additional uses are introduced to Fiesta Island. Adequate public facilities, including parking areas, must be provided to mitigate overcrowding or overuse in any single

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CONTD

area. Cal. Coastal Act § 30212.5. Yet, the EIR fails to appropriately analyze potential impacts to parking and access under Option A of the Project.

BE-11

- The EIR claims the Project is consistent with various policy and regulatory documents including, among others, the California Coastal Act (“Coastal Act”). EIR at 5.6-12. Yet the EIR fails to provide adequate justification demonstrating the Project is consistent with the Coastal Act.
- As currently proposed, Option A could potentially violate the Coastal Act. The Coastal Act provides: “Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.” *Id.* § 30240(b). Option A could interrupt the recreation area in the Southwest subarea.

BE-12

BE-13

- The EIR fails to analyze the Project’s impacts and/or compliance with the City of San Diego City Charter (“City Charter”). Under the City Charter, no more than twenty-five percent of land area in Mission Bay Park may be used for dedicated leases. City Charter § 55.1. The Master Plan recognizes this limitation. Master Plan at 51. In 2002, about 85 percent of allowable acres dedicated for lease areas in Mission Bay Park were already in use. *Id.* at 43. The EIR fails to analyze the impact the Project would have on this limit. In addition, the EIR fails to discuss whether or not the Project would comply with City Charter Section 55.1. Indeed, the EIR fails to make any reference to the City Charter despite several important provisions in the City Charter concerning Mission Bay Park.

The EIR fails to adequately analyze impacts to noise.

BE-14

- The EIR fails to adequately analyze potential impacts to noise under Option A. A map of Option A shows a road located through the fenced off-leash dog area. EIR at 3-3. Option B has no such a road. *Id.* at 3-5. The EIR performs identical analyses for impacts due to traffic noise increases under both Option A and Option B and fails to take into account the potential noise impacts due to this new proposed road under Option A. EIR at 5.7-10 – 5.7-12.

BE-15

- The EIR analysis of construction noise impacts is inadequate. The EIR simply lists a variety of construction equipment and corresponding maximum noise and vibration levels. EIR at 5.7-14 and 5.7-16. The EIR fails to provide appropriate analysis or justification for concluding that such construction activities will have no significant impact.

BE-16

- The EIR fails to conduct an adequate analysis of cumulative noise impacts. “[A] cumulative impact consists of an impact which is created as a results of the combination of the project evaluated in the EIR together with *other projects* causing related impacts.” CEQA Guidelines §15130(a)(1) (emphasis added). The EIR discusses “noise compatibility” with the surrounding area but fails to provide any analysis as to the cumulative noise impacts of the Project with any other projects that may be relevant. EIR at 5.7-19 – 5.7-20.

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- BE-17 | Indeed, the EIR even fails to consider any cumulative impacts of the Project together with another ongoing update to the Master Plan at De Anza Cove. Such a cumulative impacts analysis is inadequate as it fails to consider the “big picture.” *City of Long Beach v. City of Los Angeles* (2018) 19 Cal.App.5<sup>th</sup> 465, 490.
- The EIR fails to adequately analyze transportation/circulation impacts.
- BE-18 |
- The EIR acknowledges that various intersections and roadway segments are currently operating at an unacceptable Level of Service (“LOS”). EIR at 5.9-4 – 5.9-5. The EIR also acknowledges that the Project would increase traffic impacts in areas already operating at an unacceptable LOS. *Id.* at 5.9-11. Despite the Project’s acknowledged impacts, the EIR fails to require appropriate mitigation measures leaving significant impacts to transportation and circulation. EIR at 5.9-17 and 5.9-20.
- BE-19 |
- The EIR fails to conduct any cumulative impact analysis for transportation and circulation.
- BE-20 |
- The EIR fails to analyze the impacts of changing the circulation direction on Fiesta Island.
- BE-21 |
- The EIR also fails to recognize that Option A is inconsistent with substantive mandates of the Coastal Act. Specifically, new development “shall do all of the following ... [m]inimize energy consumption and vehicle miles traveled.” Coastal Act § 30253(d). Facilities in other areas of Mission Bay Park, such as South Shores, could be upgraded to meet all the project objectives while reducing energy consumption and miles traveled generated by new facilities that would need to be built for the Project under Option A.
- The EIR fails to adequately analyze impacts to public utilities.
- BE-22 |
- The EIR acknowledges the Project will require the construction of new facilities that would require the alternation of and addition to existing sewer systems. EIR at 5.10-2. Yet, the EIR, without justification, claims there will be no significant impacts and no mitigation measures will be required. *Id.*
- BE-23 |
- The EIR acknowledges the Project will result in the need for new water infrastructure and/or alternation to existing utilities. *Id.* Yet, the EIR, without justification, claims there will be no significant impacts and no mitigation measures will be required. *Id.* at 5.10-2 – 5.10-3.
- The EIR fails to adequately analyze visual effects and neighborhood character.
- BE-24 |
- The EIR states an impact to visual effects and neighborhood character would be significant if it would result in “[s]ubstantial change in the existing landform...” EIR at 5.12-1. The EIR fails to conduct any analysis of the physical changes that would occur under Option A. *Id.* at 5.12-3. The addition of the nonmotorized water craft elements in the Southwest subarea

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under Option A would require significant changes to the existing landform including, but not limited to, substantial grading. These are reasonably foreseeable future phases of the Project that must be analyzed in the EIR. *Laurel Heights, supra*, 47 Cal.3d at 396. Yet, the EIR fails to conduct any analysis of the relevant impacts or necessary mitigation measures to address such changes. EIR at 5.12-3. Thus, the EIR’s analysis is inadequate.

BE-25

- The Fiesta Island dog park is a unique, popular destination for dog owners from within the City and beyond to bring their dogs to enjoy the beach off-leash. The Coastal Act mandates new development “[w]here appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.” *Id.* at 30253(e). This area is a unique and population visitor destination that can be found nowhere else in the City and should be protected.

The EIR fails to analyze impacts specific to Option A.

BE-26

- The Project’s proposed Option A would have impacts specific to its additional parking, storage, ramp, pier, and floating dock. The EIR fails to analyze the impacts and risks associated with construction activities for Option A.

#### **IV. The EIR’s Discussion of Alternatives to the Proposed Project is Inadequate**

CEQA requires that an EIR “produce information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned.” *San Bernardino Valley Audubon Society v. County of San Bernardino* (1984) 155 Cal.App.3d 738, 750 – 751. “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” CEQA Guidelines § 15126.6(b). “Without meaningful analysis of alternatives in the EIR, neither the courts nor the public can fulfill their proper roles in the CEQA process.” *Laurel Heights Improvement Assoc., supra*, 47 Cal.3d at 404.

BE-27

CEQA contains a “substantive mandate” that agencies refrain from approving a project with significant environmental effects if “there are feasible alternatives or mitigation measures” that can substantially lessen or avoid those effects. *Mountain Lion Foundation v. Fish and Game Comm.* (1997) 16 Cal.4th 105, 134; Pub. Res. Code § 21002. It “requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.” *Sierra Club v. Gilroy* (1990) 222 Cal.App.3d 30, 41. Here, the EIR fails to consider any feasible alternatives that would readily reduce environmental impacts while achieving all project objectives.

- The EIR states an objective of the Project is to: “Provide improved shoreline access to bay waters through the implementation of an on-site nonmotorized

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BE-27  
CONTD

water craft storage area, improved launching area, and convenient parking for vehicles with trailers for non-motorized watercraft near the launching point (Option A only).” EIR at 3-2. Yet, the alternatives considered by the EIR fail to consider any alternative locations within Mission Bay Park for the nonmotorized water craft elements of the Project. *Id.* at 9-3 – 9-13. Indeed, the only version of the Project that includes such elements is Option A. Thus, the EIR’s alternatives analysis is inadequate.

BE-28

- The Master Plan divides Mission Bay Park into different regions. Master Plan at 38. Under the Master Plan it is essential that aquatic recreation be maximized throughout Mission Bay Park and “zones with maximum exposure to the water should generally be reserved for those activities benefitting the most from such exposure, such as picnicking, strolling or bicycling.” *Id.* at 36. The Project proposes to build facilities in a portion of Mission Bay Park that currently benefits from a largely undeveloped, natural character perfect for less intensive activities along the coast. Despite this, the EIR fails to consider any alternative location in Mission Bay Park that may be better suited for the nonmotorized water craft elements and facilities of Option A.

BE-29

- Indeed, the EIR fails to conduct any analysis of locating certain recreation elements of Option A on underutilized beach in the South Shore area of Mission Bay Park despite the Master Plan identifying that area as suitable for such recreation. Master Plan at 38 – 40. Locating nonmotorized water craft facilities on the South Shore portion instead of the current location under Option A would, among other things, require less grading, reduce traffic impacts on Fiesta Island, and reduce user conflicts. The alternative location of these facilities on the South Shore, merely a few hundred feet from the current proposal, would also: “Provide improved shoreline access to bay waters through the implementation of an on-site nonmotorized water craft storage area, improved launching area, and convenient parking for vehicles with trailers for non-motorized watercraft near the launching point...” EIR at 3-2. Thus, the EIR’s fails to identify and discuss an alternative that is clearly environmentally superior and capable of achieving all project objectives.

BE-30

- In addition, the EIR’s failure to consider alternative locations for the nonmotorized water craft elements of Option A is a violation of the Coastal Act. The grading necessary under Option A would damage the sand banks in the Southwest subarea a fragile coastal resources important for erosion control. Coastal Act § 30212(a)(1).

BE-31

- The Coastal Act requires a measure of feasibility in considering coastal visitor-serving facilities. *Id.* §§ 30213, 30250(c). The Coastal Act aspires for visitor-serving facilities to “feasibly be located in existing developed areas...” *Id.* § 30250(c). The EIR’s failure to consider locating the unique elements of Option A in areas of existing development, such as the existing facilities in the South Shores area of Mission Bay Park, is inappropriate and a violation of the Coastal Act.

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**V. The EIR Must be Recirculated**

BE-32

The EIR claims to be a “program” EIR for an amendment to one portion of the Mission Bay Park Master Plan. EIR at ES-1. “A program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible.” CEQA Guidelines § 15168(c)(5). The EIR’s discussions and analyses are sufficiently lacking as a program EIR and must be significantly revised and recirculated.

**VI. Conclusion**

For the foregoing reasons, FIDO urges you to reject the Project and EIR as drafted. Thank you for your consideration of these concerns.

Sincerely,



Everett DeLano

## 2. Response to Comments

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## 2. Response to Comments

**BE. Response to Comments from DeLano and DeLano (on behalf of FIDO), dated January 22, 2019.**

BE-1 The commenter summarizes case law on the interpretation and function of CEQA. The commenter states that the project description is inadequate. The identification of Option A in Chapter 9, *Alternatives to the Proposed Projects*, as the Proposed Project has been removed in the FEIR. Options A and B were analyzed at the same level in the PEIR and the City Council will be able to adopt either. Chapter 3, *Project Description*, is a thorough description of the Amendment and provides an accurate account of the project analyzed in the PEIR.

See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.

BE-2 The commenter cites case law regarding the requirements of an EIR and its purpose. The comment does not cite a specific issue with the adequacy of the PEIR as it relates to CEQA; therefore, no further response is necessary.

BE-3 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review. Additionally, Section 5.2, *Biological Resources*, of the PEIR provides a mitigation framework for projects developed pursuant to the Amendment. Mitigation Measures BIO-1 through BIO-6 require surveys, mitigation plans, and other specific measures that are required prior to any construction or grading activities for development of projects pursuant to the Amendment.

BE-4 See response to BE-3, above.

BE-5 See response to BE-3, above.

BE-6 See Impact 5.3-2 in Section 5.3, *Geologic Conditions*. Impacts from erosion would be less than significant and no mitigation is required.

BE-7 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.

BE-8 Impacts associated with grading and construction activities are discussed in Section 5.5, *Hydrology and Water Quality*, which determined that the project would result in a less than significant impact to water quality. Future development per the proposed project would be required to adhere to the requirements of the City's Drainage Design Manual and Storm Water Standards Manual, which require installation of low-impact development (LID) practices, such as bioretention areas, pervious pavements, etc., which would

## 2. Response to Comments

- improve surface drainage and reduce impacts from erosion to below a level of significance.
- BE-9 Existing GHG emissions are found in Table 2-7 on page 2-43 of the PEIR. Operational emissions are compared to existing emissions on Table 5.4-1 of the PEIR.
- BE-10 The island is sufficiently sized to provide parking for all planned uses. Parking is not a CEQA issue provided the parking of cars do not affect the surrounding area. As the proposed project is an island in Mission Bay with a single access point, and parking exists both on the island and at the access point, there is no way for parking for events on the island to impact adjacent uses. It is also reasonable to assume that future uses would be developed with parking as shown in Chapter 3, Project Description. See also Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- BE-11 The proposed project includes a Local Coastal Program (LCP) Land Use Plan that requires approval by the City, and certification by the California Coastal Commission (CCC). Appendix 5.6-1 of the PEIR compares the proposed project to the policies of the LCP Land Use Plan and determined that the proposed project would be consistent with the policies.
- BE-12 The proposed project is a Program-level EIR. New development proposed on Fiesta Island would be subject to review for consistency with the LCP Land Use Plan and the Coastal Act. The commenter does not provide a connection of how Option A would result in an interruption of the recreation area in the Southwest subarea.
- BE-13 Dedicated leases on Fiesta Island would continue to comply with the San Diego City Charter. Any future leases proposed on Fiesta Island would also have to continue to comply with the Charter. The comment is not a CEQA issue; therefore, no further response is necessary. See also Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- BE-14 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review. Further, vehicle speeds on the Island are, at most, 25 miles per hour and vehicle volumes would be low. Thus, noise from vehicular traffic on the Island would be below the City's Significance Threshold for both Options A and B.
- BE-15 See Section 5.7, *Noise*, of the PEIR.

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- BE-16 See Subsection 5.7.5, *Cumulative Impacts*, of Section 5.7, *Noise*. “Noise Compatibility” was meant to provide context for Fiesta Island, which is situated in an area with freeway traffic noise and motorized watercraft noise.
- BE-17 See response to BE-16, above.
- BE-18 As indicated by the levels of service shown in Tables 5.9-10 and 5.9-11 in Section 5.9 of the PEIR, development of either Option A or Option B would not result in a significant contribution to significant impacts under weekday conditions, but would significantly contribute to significant impacts to certain segments under weekend conditions. While implementation of Mitigation Measures TRANS-1, TRANS-2, and TRANS-3 would increase capacity of the affected roadways, these measures are not recommended based on the City’s need to consider transportation improvements on a comprehensive Citywide basis, which includes a focus toward shifting mode shares to active transportation, consistent with City plans and policies promoting active modes of transportation. See pages 5.9-16 through 5.9-17 for discussion of level of significance after mitigation.
- Additionally, as indicated by the levels of service shown in Tables 5.9-12 of the PEIR, implementation of either Option A or Option B would significantly contribute to significant impacts at two study intersections under weekday and weekend conditions. While implementation of Mitigation Measures TRANS-4 option ‘b’ and TRANS-5 would increase capacity of the affected intersections and mitigate the vehicular impacts, these measures are not recommended based on the City’s need to consider transportation improvements on a comprehensive Citywide basis, which includes focus toward shifting mode shares to active transportation, consistent with City plans and policies promoting active modes of transportation. See pages 5.9-19 and 5.9-20 for discussion of level of significance after mitigation.
- BE-19 Cumulative mobility impacts are discussed in Subsection 5.9.4.2, 2050 Plus Project, in Section 5.9 of the PEIR.
- BE-20 The impact analysis of Section 5.9, *Transportation/Circulation*, was prepared under the assumption that the circulation and one-way travel direction on Fiesta Island Road is being reversed to accommodate roadway improvements, some of which would have two-way traffic flow. Also, by reversing the traffic direction to clockwise, bicyclists are now able to ride along the interior of the roadway and there would be a reduction in vehicle and bicycle turning conflicts.
- BE-21 See Appendix 5.6-1, *Local Coastal Program Consistency Analysis*, which addresses Coastal Act Section 30253(d).
- BE-22 Section 5.10 of the PEIR, *Public Utilities*, states that proposed water connections would follow the Fiesta Island Road loop and connect to the northern part of the island, and the southeastern and southwestern subareas. See also Section 2.1 of the FEIR, *Master*

## 2. Response to Comments

*Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review. Future development that would require water and wastewater infrastructure would be required to comply with City and state requirements, and would be evaluated under its own environmental review.

- BE-23 See response to BE-22, above.
- BE-24 As provided in Impact 5.12-3 of the PEIR, grading needed for future development would result in visual character that would be similar to existing conditions, consisting largely of landscaping, trails, and paths. As such, the impact would be less than significant and no mitigation would be required.
- BE-25 The comment does not address a specific CEQA issue.
- BE-26 Environmental impacts were analyzed for both Option A and Option B, as they were described in the Chapter 3, *Project Description*. Separate analysis for each option was provided in Chapter 5, *Environmental Analysis*. Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- BE-27 The project site encompasses Fiesta Island. No significant environmental impacts or mitigation measures were associated with the location of the proposed water craft elements. Therefore, alternatives that consider moving one component of the proposed project (motorized watercraft elements) to other areas within Mission Bay were necessary to eliminate or reduce an identified significant impact, therefore relocation of a single project element was not required in the PEIR.
- BE-28 See response to BE-27, above.
- BE-29 See response to BE-27, above.
- BE-30 See response to BE-27, above. Impacts associated with grading and coastal resources would be reviewed on a project-specific basis, if necessary, with future proposed development.
- BE-31 See response to BE-27, above.
- BE-32 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.

## 2. Response to Comments

LETTER BF – Brian Bender (1 page)

**From:** Brian Bender the Lender  
**To:** [PLN Planning/CFO; Osborn, Sara](#)  
**Subject:** Mission Bay Park Master Plan Fiesta Island Amendment and Number: 562189  
**Date:** Tuesday, January 22, 2019 5:15:51 PM

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Hello,

My name is Brian Bender and my family and I relocated from Hawaii to San Diego in 2015. We are dog owners and ocean enthusiasts including outrigger paddling and other non motorized watercraft. We love the balance that San Diego currently strives to maintain between pet owners and ocean enthusiasts. I feel that the 80 acres at fiesta island is plenty of room to accommodate dog owners and ocean lovers. I am in favor of option A as it meets the needs of all parties. Currently, there are proposed changes for Bahia Point and Campland which will eliminate those as launch areas. It would really limit launch areas if we lost Fiesta Island as well. It would be a shame to limit more public's access to such a beautiful bay.

I vote for option A.

Mahalo,

**Brian Bender | The Lender**  
Senior Loan Officer | President | NMLS # 379538

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500 Ala Moana Blvd, Suite 7-400, Honolulu, HI 96813  
**t:** 808-426-7652 **f:** 800-520-6917  
**w:** [kmghawaii.com](http://kmghawaii.com)

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## 2. Response to Comments

**BF. Response to Comments from Brian Bender, dated January 22, 2019.**

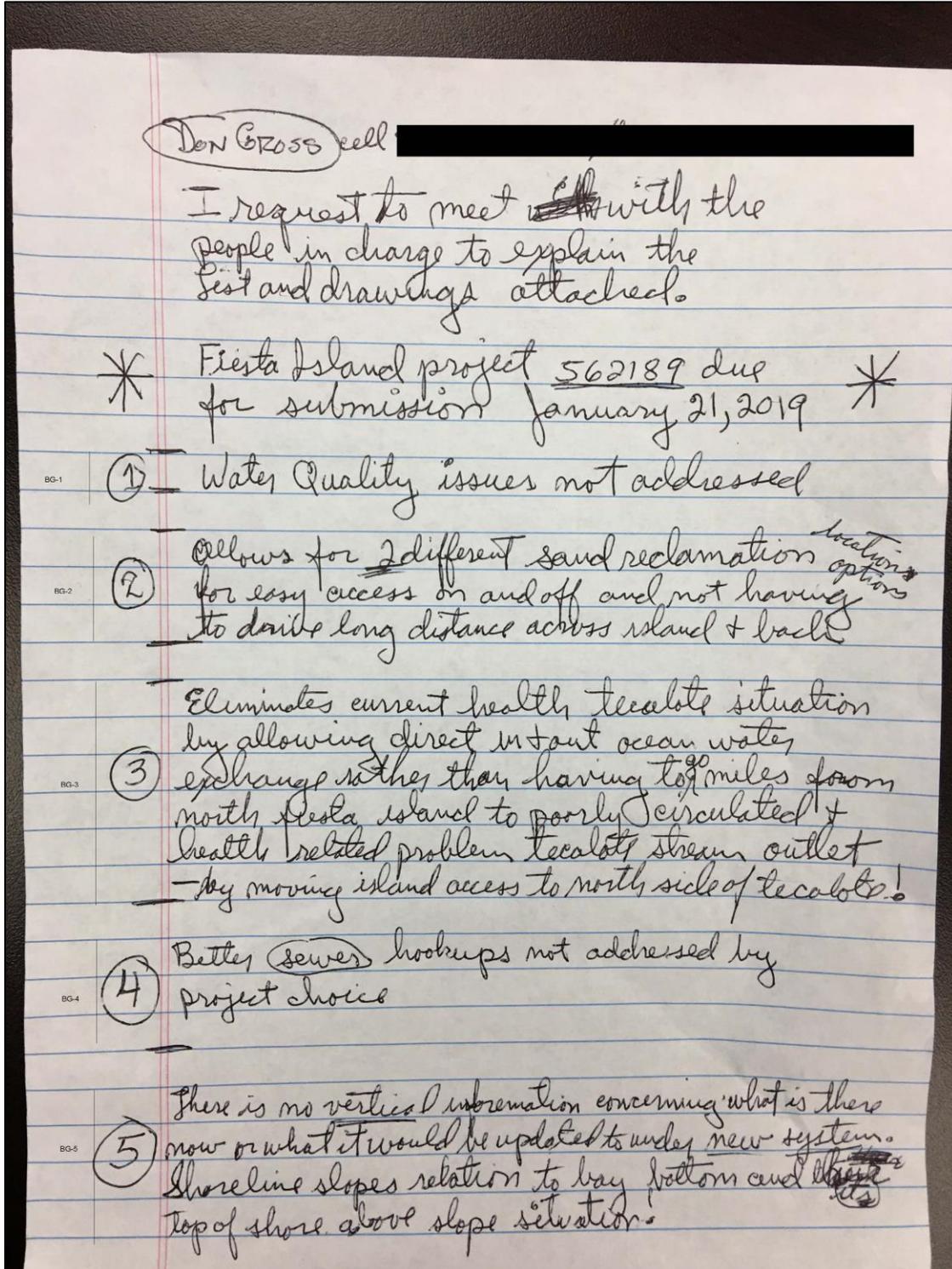
BF-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.

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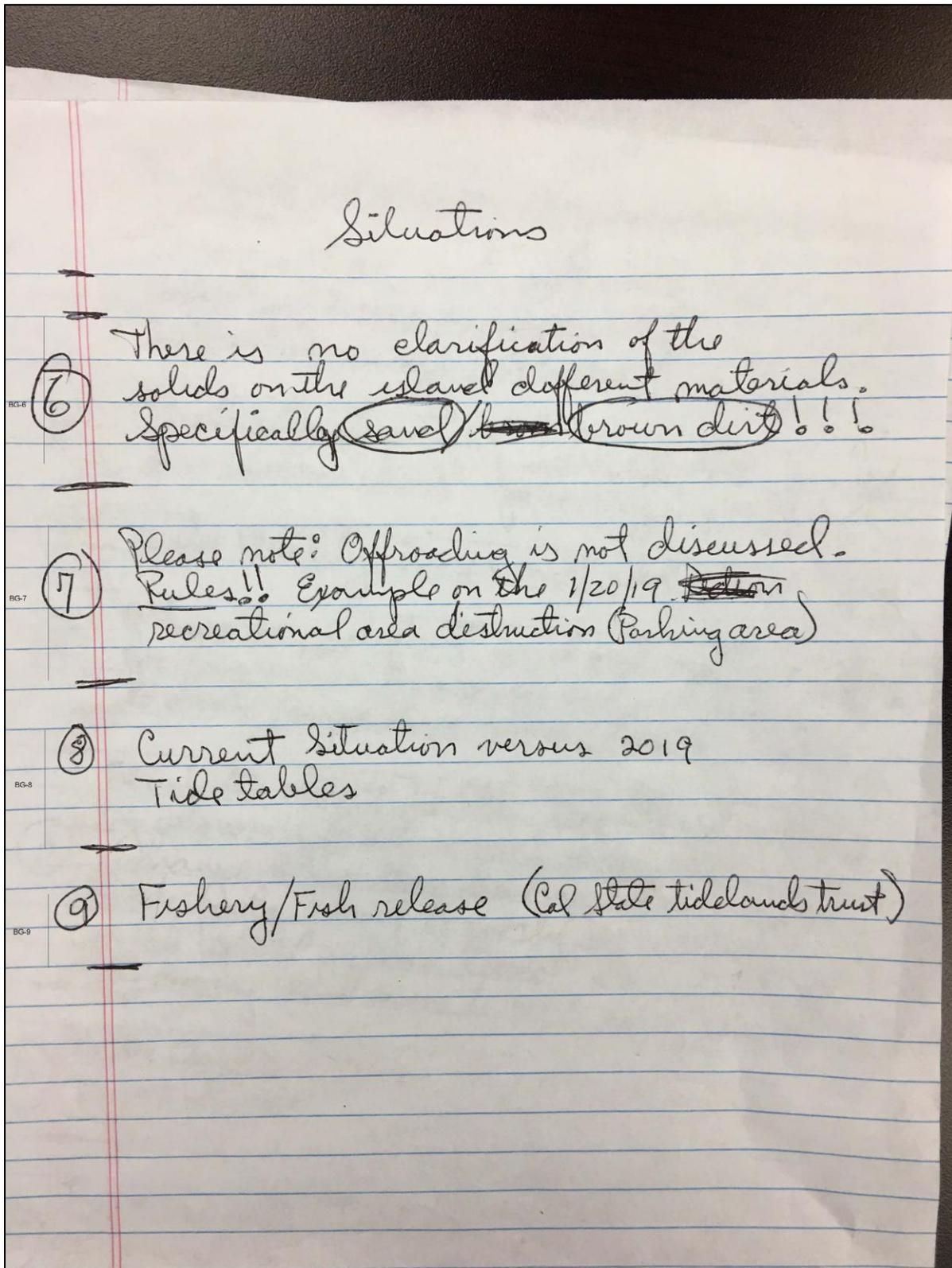
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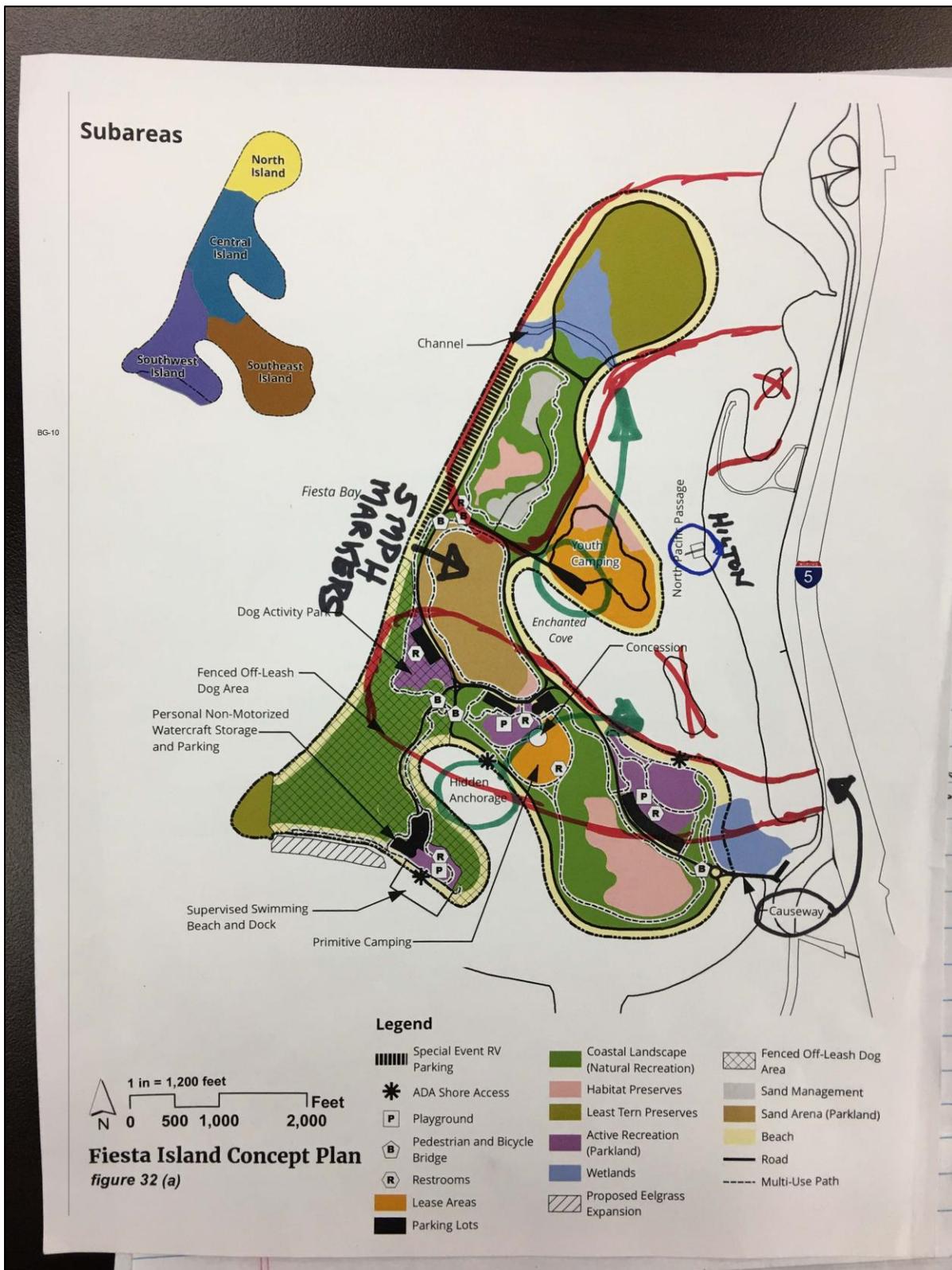
LETTER BG - Don Gross (3 pages)



## 2. Response to Comments



2. Response to Comments



## 2. Response to Comments

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## 2. Response to Comments

### **BG. Response to Comments from Don Gross, dated January 21, 2019.**

- BG-1 See Section 5.5, *Hydrology and Water Quality*, which determined that the project would result in a less than significant impact to water quality. Future development per the proposed project would be required to adhere to the requirements of the City’s Drainage Design Manual and Storm Water Standards Manual, which require installation of low-impact development (LID) practices, such as bioretention areas, pervious pavements, etc., which would improve surface drainage and not exacerbate flooding or cause erosion.
- BG-2 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- BG-3 See response to BG-2, above.
- BG-4 See response to BG-2, above.
- BG-5 Existing conditions information is provided in Chapter 2, Environmental Setting, of the PEIR. Estimates for changes in slope and shoreline are approximations based on program-level analysis. The commenter is also not clear what their environmental concern is. See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- BG-6 See response to BG-2, above.
- BG-7 See response to BG-2, above.
- BG-8 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BG-9 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BG-10 The commenter provides a hand-marked up version of the proposed Fiesta Island Concept Plan, Option A. The comment does not address the adequacy of the PEIR as it relates to CEQA.

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## 2. Response to Comments

LETTER BH – California Department of Fish and Wildlife (CDFW) (5 pages)

	<p>State of California – Natural Resources Agency DEPARTMENT OF FISH AND WILDLIFE South Coast Region 3883 Ruffin Road San Diego, CA 92123 (858) 467-4201 <a href="http://www.wildlife.ca.gov">www.wildlife.ca.gov</a></p>	<p>GAVIN NEWSOM, Governor CHARLTON H. BONHAM, Director</p>	
<p>January 25, 2019</p>			
<p>Rebecca Malone, Environmental Planner City of San Diego, Planning Department 9485 Aero Drive, MS 413 San Diego, CA 92123 <a href="mailto:PlanningCEQA@sandiego.gov">PlanningCEQA@sandiego.gov</a></p>			
<p><b>Subject: Comments on the Draft Program Environmental Impact Report for the Mission Bay Park Master Plan Update—Fiesta Island Amendment, SCH No. 2017051034, Project No. 562189</b></p>			
<p>Dear Ms. Malone:</p>			
<p>The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Draft Program Environmental Impact Report (DPEIR) for the Mission Bay Park Master Plan Update—Fiesta Island.</p>			
<p>Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the proposed project that may affect California fish and wildlife. The Department appreciates the City extending the DPEIR comment period until January 25, 2019 (Rebecca Malone, 2019). Likewise, we appreciate the opportunity to provide comments regarding those aspects of the proposed project that the Department, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.</p>			
<p><b>Department Role</b></p>			
<p>BH-1</p>	<p>The Department is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish &amp; G. Code, §§ 711.7, subd. (a) &amp; 1802; Pub. Resources Code, § 21070; California Environmental Quality Act [CEQA] Guidelines § 15386, subd. (a).) The Department, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (<i>Id.</i>, § 1802.) Similarly for purposes of CEQA, the Department is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.</p>		
<p>The Department is also a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) The Department may need to exercise regulatory authority as provided by the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) program. The City of San Diego (City) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP).</p>			
<p><i>Conserving California's Wildlife Since 1870</i></p>			

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Rebecca Malone, Environmental Planner  
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### **Project Location**

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

### **Project Description/Objective**

The proposed Project would amend the existing Mission Bay Park Master Plan (Master Plan) to update the Fiesta Island Concept Plan (proposed Project). The proposed Project includes maps, diagrams, and supporting policies in the Master Plan that would guide future improvements to the approximately 470-acre island in four subareas. The proposed Project includes two options, Option A and Option B, with different elements in one of the four subareas, the southwest subarea.

Option A for the southwest subarea includes a fenced off-leash dog park and shoreline park. New developed facilities are also planned as part of the dog park, including a small dog fenced off-leash area, a dog special event area, a special event obstacle course, and a canine competition staging area. Other facilities for the dog park would be created as part of the improvements, such as a series of fences and double-gates to help contain off-leash dogs. A new parking lot would also be constructed as part of the developed dog park facilities. Recreational trails would be enhanced throughout the fenced off-leash dog area.

A new roadway that extends south to a public parking area with trailer spaces would provide access to a non-motorized boat storage area, nearby beach watercraft storage areas, and a shore launching area for non-motorized watercrafts. Adjacent to the boat storage, a plaza, a playground, a lifeguard tower, and public restrooms would all be located next to a supervised swimming beach along with ADA shore access as well as a pier, ramp, and floating dock. The existing Stony Point least tern nesting site would remain, as would the existing seasonal closure fencing and buffer. Eelgrass restoration is planned off the southeast shore of Stony Point.

Option B for the Southwest Subarea includes a fenced off-leash dog park and shoreline park. New developed facilities would include a proposed small dog fenced off-leash area. Other facilities for the dog park would be created as part of the improvements, such as a series of fences and double-gates to help contain off-leash dogs. Recreational trails would be enhanced throughout the fenced off-leash dog area. A view pavilion, plaza, and seating are also proposed as part of the trail improvements. Two new parking lots would also be constructed, one near the new developed dog park facility and one near Hidden Anchorage Bay adjacent to Fiesta Island Road. The existing Stony Point least tern nesting site would remain, as would the existing seasonal closure fencing and buffer. Eelgrass restoration is also planned off the southeast shore of Stony Point.

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

BH-2

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Rebecca Malone, Environmental Planner  
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BH-3

1) All mitigation measures incorporated in the DPEIR should be applicable and feasible to project tiering from the program document. Feasible as defined by CEQA Guidelines section 15364 means measures that are "...capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." Implementation (e.g., species buffers) of mitigation measures BIO-2 and BIO-3 are contingent upon the presence of City Multi-Habitat Planning Areas (MHPA). However, many of the sensitive habitat types are found outside of the boundaries of the MHPA, for example disturbed and undisturbed southern coastal salt marsh, saltpan/mudflats, southern foredunes, and Diegan coastal sage scrub. Furthermore, a predominance of the sensitive species occurrences that the mitigation measures address (e.g., northern harrier (*Circus cyaneus*), white-tailed kite (*Elanus leucurus*), loggerhead shrike (*Lanius ludovicianus*), Nuttall's lotus (*Acmispon prostratus*), coast woolly-heads (*Nemacaulis denudata* var. *denudata*), and sstuary sea-blite (*Suaeda esteroa*) to name a few) occur outside, if not exclusively outside, of MHPA. Despite being located outside of the formal boundaries of the MHPA, these sensitive habitat types and species warrant coverage by the PDEIR's mitigation measures. Therefore, any proposed mitigation measures reliant upon the presence of MHPA for implementation are uncertain, and do not meet the definition of feasible. In order to make these mitigation measures feasible, the Department recommends that the DPEIR state clearly that the mitigation measures will apply to Fiesta Island and will be consistent with City MHPA Guidelines similar to the statement made in mitigation measure BIO-1.

BH-4

2) For consistency with the City's SAP and to achieve the conservation values therein, the Department suggests the PDEIR to, at a minimum, incorporate the mitigation ratios as depicted in the City's SAP Table 2—Wetland Mitigation Ratios. Presently, Mitigation Measure BIO-1 states that "[a]ny wetland impact shall be mitigated at a minimum of 1:1." The ratios provided within the City's SAP "...in combination with the requirements for no-net-loss of functions and values and in-kind mitigation, are adequate to achieve the conservation goals of the City's MSCP Subarea Plan for wetland habitats..." (City, 1997).

BH-5

3) Mitigation Measure BIO-1 (City, 2019, p. ES-6) of the DPEIR should include a mitigation plan where impacts to sensitive biological resources are known or reasonably known. Where impacts are not reasonably known or are too specific given the programmatic nature of the document, the PDEIR should identify that construction or grading within areas of sensitive biological resources will be analyzed in a subsequent CEQA document (see also Biological Technical Report for the Fiesta Island Amendment—October 2017, Alden Environmental).

In addition, Mitigation Measure BIO-1 should require that biological surveys be updated prior to subsequent project approvals and prior to impacts. Surveys for federally and state listed sensitive or MSCP-covered species should be conducted at the appropriate time of year to detect species presence/absence and should not be older than 24 months (see City Biology Guidelines, p. 18).

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BH-6

4) The Department recommends Concept Plan-Option B because it does not introduce uses such as a pier, boat storage, or a swimming area adjacent to the Stoney Point least tern colony where these individuals are likely to forage. As discussed in the Department's comments made on this project's Notice of Preparation (NOP, June 8, 2017), the low reproductive success of least terns may be attributed to "[a] lack of sufficient foraging resources [and] is widely thought to be a significant factor limiting California least tern population growth" (CDFW, 2016). Furthermore, the Department's comments on the NOP recommended that the PDEIR include alternatives such as: 1) increasing the buffers to least tern colonies; 2) limiting access to least tern colonies during low tides by extending the current fence line further into the bay; 3) increasing least tern management activities; 4) prohibiting off-leash uses adjacent to least tern colonies; and, 5) precluding recreational uses within key least tern foraging areas (based on the recommended least tern foraging study during the NOP comment period for Fiesta Island).

BH-7

5) Should a Project alternative be selected that sites recreational activities within or adjacent to a least tern colony area, the Department recommends that the City conduct the foraging study (originally recommended by the Department in our comments during the NOP) to assist the appropriate siting of recreational activities and facilities in a manner that minimize disturbances to least tern foraging activity. No projects should be approved without first analyzing the potential impact to least tern foraging opportunities.

BH-8

6) Southern foredunes habitats are exceedingly rare and difficult to mitigate when impacted. We encourage the Mission Bay Park Master Plan Update and any subsequent project to prioritize full avoidance of this habitat type and to incorporate restoration elements as appropriate.

BH-9

7) Mitigation for sensitive plant species should include contingency measures to address unsuccessful translocation efforts. Contingencies may include, but are not limited to, seed bulking and/or greenhouse propagation and outplanting.

BH-10

8) In addition to being required for dredging activities, eelgrass surveys should also be conducted where having baseline information will inform the impacts of future uses. For example, these surveys should be conducted where projects and/or infrastructure have the potential to shade eelgrass habitat (e.g., docks and piers), where projects have the potential to physically disturb eelgrass beds through the placement of physical structures (e.g., piers), or where eelgrass beds could be indirectly disturbed as a result of implanting a project feature (e.g., swimming areas and boat use/launch areas).

BH-11

9) The Final DPEIR should include mitigation measures that will be implemented to adequately address impacts to eelgrass. The Department recommends that eelgrass surveys and mitigation meet or exceed minimum requirements and performance standards as per the California Eelgrass Mitigation Policy (NOAA, 2014) unless otherwise approved in writing by the Department.

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Rebecca Malone, Environmental Planner  
City of San Diego, Planning Department  
January 25, 2019  
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### CONCLUSION

We appreciate the opportunity to comment on the referenced DPEIR. Questions and further coordination on marine issues should be directed to Loni Adams, Environmental Scientist at [Loni.Adams@wildlife.ca.gov](mailto:Loni.Adams@wildlife.ca.gov) or 858-627-3985. Questions and further coordination on other issues should be directed to Eric Weiss, Senior Environmental Scientist, at [Eric.Weiss@wildlife.ca.gov](mailto:Eric.Weiss@wildlife.ca.gov) or (858) 467-4289.

Sincerely,



Gail K. Sevens  
Environmental Program Manager

ec: William Paznokas (R7-CDFW)  
David Zoutendyk, U.S. Fish and Wildlife Service  
State Clearinghouse, Sacramento

### REFERENCES

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Merkel and Associates, Inc., 2016. Mission Bay Biological Resource Letter Report, Mission Bay Navigational Safety Dredg

## 2. Response to Comments

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## 2. Response to Comments

### **BH. Response to Comments from CDFW, dated January 25, 2019.**

- BH-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BH-2 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- BH-3 All project mitigation measures will be applied, as appropriate, to future development projects on the island consistent with the proposed project.
- BH-4 Mitigation ratios will be as adopted by the City or required by the relevant development permit.
- BH-5 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review. The project-specific review would develop the mitigation plan referred to by the commenter.
- BH-6 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- BH-7 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- BH-8 Comment noted. See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- BH-9 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- BH-10 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- BH-11 The requirement for baseline surveys is included in Mitigation Measure BIO-1 on page 5.2-7 of the PEIR.

## 2. Response to Comments

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## 2. Response to Comments

LETTER BI – San Diego County Archaeological Society, Inc. (1 page)

	<b>San Diego County Archaeological Society, Inc.</b>
	Environmental Review Committee
	20 January 2019
To:	Ms. Rebecca Malone Planning Department City of San Diego 9485 Aero Drive, MS 413 San Diego, California 92123
Subject:	Draft Program Environmental Impact Report Mission Bay Park Master Plan – Fiesta Island Amendment Project No. 562189
Dear Ms. Malone:	
BI-1	I have reviewed the cultural resources aspects of the subject DPEIR on behalf of this committee of the San Diego County Archaeological Society.
	Based on the information contained in the DPEIR, we agree that the project is unlikely to have any significant impacts on cultural resources. Therefore, we also agree that no cultural resources mitigation measures are necessary.
	SDCAS appreciates being included in the City's environmental review process for this project.
	Sincerely,
	 James W. Royle, Jr., Chairperson Environmental Review Committee
cc:	SDCAS President File
	P.O. Box 81106 San Diego, CA 92138-1106 (858) 538-0935

## 2. Response to Comments

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## 2. Response to Comments

**BI. Response to Comments from San Diego County Archaeological Society, Inc., dated January 20, 2019.**

BI-1 The comment states that the San Diego County Archaeological Society agrees with the analysis in the PEIR that the project would not result in a significant impact to cultural resources.

## 2. Response to Comments

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## 2. Response to Comments

LETTER C – Erin Sweeney (1 page)

**From:** Erin Sweeney  
**To:** [Malone, Rebecca](#)  
**Subject:** RE: DRAFT PEIR -- Mission Bay Park Master Plan Fiesta Island Amendment / Project No. 562189 - Public Notice  
Date December 7, 2018  
**Date:** Friday, December 07, 2018 10:27:59 AM

---

C-1

Thank you for including me in this distribution. My dog and I love the dog park and we hope the proposed improvements can enhance rather than diminish it.

---

**From:** Malone, Rebecca <RMalone@sandiego.gov>  
**Sent:** Friday, December 7, 2018 10:11 AM  
**To:** Malone, Rebecca <RMalone@sandiego.gov>  
**Subject:** DRAFT PEIR -- Mission Bay Park Master Plan Fiesta Island Amendment / Project No. 562189 - Public Notice Date December 7, 2018

### **DRAFT PEIR**

Please see the attached public notice for the Draft Program Environmental Impact Report for the Mission Bay Park Master Plan Fiesta Island Amendment that was distributed for public review starting today, December 7, 2018, and ending January 21, 2019.

**Rebecca Malone, AICP**  
Senior Planner  
Planning Department  
City of San Diego

T: 619-446-5371  
sandiego.gov

## 2. Response to Comments

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## 2. Response to Comments

### C. **Response to Comments from Erin Sweeney, dated December 7, 2018.**

C-1           The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER D – Rick Kamen (1 page)

**From:** R  
**To:** [Malone, Rebecca](#)  
**Cc:** [PLN Planning/CEOA](#)  
**Subject:** RE: DRAFT PEIR -- Mission Bay Park Master Plan Fiesta Island Amendment / Project No. 562189 - Public Notice  
Date December 7, 2018  
**Date:** Friday, December 07, 2018 6:59:11 PM

---

D-1 | Thank you for sending me the PEIR for the Fiesta Island Amendment.

I had a hard time visualizing all the proposed changes from the written description alone.

Do you have a picture or diagram of the proposed changes you can e-mail me or direct me to?

Thank you,

Rick Kamen

---

**From:** Malone, Rebecca [mailto:RMalone@sandiego.gov]  
**Sent:** Friday, December 7, 2018 10:09 AM  
**To:** Malone, Rebecca  
**Subject:** DRAFT PEIR -- Mission Bay Park Master Plan Fiesta Island Amendment / Project No. 562189 - Public Notice Date December 7, 2018

**DRAFT PEIR**

Please see the attached public notice for the Draft Program Environmental Impact Report for the Mission Bay Park Master Plan Fiesta Island Amendment that was distributed for public review starting today, December 7, 2018, and ending January 21, 2019.

**Rebecca Malone, AICP**  
Senior Planner  
Planning Department  
City of San Diego

T: 619-446-5371  
sandiego.gov

---

 Virus-free. [www.avg.com](http://www.avg.com)

## 2. Response to Comments

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## 2. Response to Comments

### D. Response to Comments from Rick Kamen, dated December 7, 2018.

- D-1 Chapter 3, *Project Description*, Figure 3-1, Fiesta Island Concept Plan – Option A, and Figure 3-2, Fiesta Island Concept Plan – Option B, provide graphics of the proposed project options.

## 2. Response to Comments

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## 2. Response to Comments

LETTER E – Karen Tremain (1 page)

**From:** Karen Tremain  
**To:** [Malone, Rebecca](#)  
**Subject:** Re: DRAFT PEIR -- Mission Bay Park Master Plan Fiesta Island Amendment / Project No. 562189 - Public Notice  
Date December 7, 2018  
**Date:** Friday, December 07, 2018 9:23:37 PM

---

E-1 | **No, opposed to plan.**

On Friday, December 7, 2018, 10:11:33 AM PST, Malone, Rebecca <RMalone@sandiego.gov> wrote:

**DRAFT PEIR**

Please see the attached public notice for the Draft Program Environmental Impact Report for the Mission Bay Park Master Plan Fiesta Island Amendment that was distributed for public review starting today, December 7, 2018, and ending January 21, 2019.

**Rebecca Malone, AICP**

Senior Planner  
Planning Department  
City of San Diego

T: 619-446-5371  
sandiego.gov

## 2. Response to Comments

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## 2. Response to Comments

### **E. Response to Comments from Karen Tremain, dated December 7, 2018.**

E-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER F – Ed Lima (1 page)

**From:** e.lima  
**To:** [Malone, Rebecca](#)  
**Subject:** RE: DRAFT PEIR -- Mission Bay Park Master Plan Fiesta Island Amendment / Project No. 562189 - Public Notice  
Date December 7, 2018  
**Date:** Saturday, December 08, 2018 10:55:35 AM

---

F-1

I need a map of current planning layout to understand the draft and text as it pertains to the Island changes and improvements and designated sections  
Ed

---

**From:** Malone, Rebecca [mailto:RMalone@sandiego.gov]  
**Sent:** Friday, December 07, 2018 10:09 AM  
**To:** Malone, Rebecca  
**Subject:** DRAFT PEIR -- Mission Bay Park Master Plan Fiesta Island Amendment / Project No. 562189 - Public Notice Date December 7, 2018

### **DRAFT PEIR**

Please see the attached public notice for the Draft Program Environmental Impact Report for the Mission Bay Park Master Plan Fiesta Island Amendment that was distributed for public review starting today, December 7, 2018, and ending January 21, 2019.

**Rebecca Malone, AICP**  
Senior Planner  
Planning Department  
City of San Diego

T: 619-446-5371  
sandiego.gov

## 2. Response to Comments

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## 2. Response to Comments

### F. **Response to Comments from Ed Lima, dated December 8, 2018.**

F-1 The current adopted layout is included as Figure 2-3, Adopted Fiesta Island Concept Plan, in Chapter 2 of the PEIR.

## 2. Response to Comments

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## 2. Response to Comments

LETTER G – Carrie Kirtz (3 pages)

**From:** Carrie Kirtz  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** Re: DRAFT PEIR -- Mission Bay Park Master Plan Fiesta Island Amendment / Project No. 562189 - Public Notice  
Date December 7, 2018  
**Date:** Monday, December 10, 2018 11:06:49 AM

---

G-1 Dear Planning Committee,

I am a home owner in Crown Point, 1963 Fortuna Ave, 92109, and a dog owner who loves Fiesta Island and use it multiple times a week. While I love the park as it is, I implore the committee to go with *plan B*, if changes must be made. Dog owners have taken great care of the off leash area and use it year round whereas a lot of others only visit the island during the warmer summer months. Please consider this when making your decision.

Thanks so much,  
Carrie Kirtz

On Mon, Dec 10, 2018 at 10:29 AM Fiesta Island Project Team  
<[info@fiestaislandamendment.com](mailto:info@fiestaislandamendment.com)> wrote:

**Draft PEIR**

The Draft Program Environmental Impact Report for the Mission Bay Park Master Plan Fiesta Island Amendment was distributed for public

## 2. Response to Comments

review starting December 7, 2018 and ending January 21, 2019.

You can [view the Notice of Availability here](#). To review all the documents available for public review, visit:

[www.fiestaislandamendment.com](http://www.fiestaislandamendment.com).

[Find Out More →](#)

### Contact Us

Sara Osborn, Senior Planner  
Planning Department  
City of San Diego  
[info@FiestaislandAmendment.com](mailto:info@FiestaislandAmendment.com)

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You are receiving this email because you signed up to receive updates about the Fiesta Island Amendment to the Mission Bay Master Plan.

**Our mailing address is:**

City of San Diego  
1222 First Avenue  
San Diego, CA 92101

[Add us to your address book](#)

## 2. Response to Comments



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## 2. Response to Comments

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## 2. Response to Comments

### **G. Response to Comments from Carrie Kirtz, dated December 10, 2018.**

G-1 The comment does not address the adequacy of the PEIR as it pertains to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER H – Lauren Kahal (2 pages)

**From:** Lauren Kahal  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** Mission Bay Park Master Plan – Fiesta Island Amendment #562189  
**Date:** Monday, December 10, 2018 12:53:55 PM

---

Hello,

H-1 | I support "Option B" of the Mission Bay Park Master Plan as it leaves the current fenced area for off-leash dogs and their owners largely intact. As a dog owner and resident of San Diego, I appreciate the natural, open character of Fiesta Island's "Southwest Subarea" and do not want to see a road or paved parking lots constructed within it.

H-2 | "Option A" would turn the area into a more developed park with reduced off-leash opportunities. If the road proposed in "Option A" was constructed, it would bring more vehicles, many of which would be RV's or towing boats, into the middle of the off-leash recreation area, posing a safety concern and degrading the natural character of the park. Should this option be constructed, I would anticipate that the remaining natural, open off-leash dog areas in the region (e.g., Ocean Beach Dog Beach and Del Mar Dog Beach) would see an increase in users as dog owners seek out larger, natural, and safe options to walk and run with their off-leash dogs. This in turn could cause these other similar facilities in the region to deteriorate faster, which would be a significant impact that was not disclosed in the project's EIR. In the event that "Option A" is chosen, H-3 | against the wishes of many San Diegans, the EIR would need to be updated and recirculated with a discussion of impacts to recreational facilities pursuant to Appendix G of the CEQA Guidelines.

H-4 | I appreciate the City's consideration of the open space needs of the City and greater region as well as its commitment to preserving the unique character of Fiesta Island. "Option B" is a good compromise, as it locates the road and parking lots towards the edge of the fenced off-leash area and preserves the natural, open character of the park.

Thank you,  
Lauren Kahal and her dog, Inyo

## 2. Response to Comments



## 2. Response to Comments

### H. Response to Comments from Lauren Kahal dated December 10, 2018.

- H-1 The comment does not address the adequacy of the PEIR as it pertains to CEQA.
- H-2 As the proposed project results in the largest off-leash dog park in the region, regardless of whether Option A or Option B is chosen, it is unlikely that dog owners would travel further afield to find even larger dog parks. Potential impacts that are based on the potential actions of future park users are too speculative for consideration in the PEIR.
- H-3 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.
- H-4 The comment does not address the adequacy of the PEIR as it pertains to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

### LETTER I – Melissa Chavarro (1 page)

**From:** Melissa Chavarro  
**To:** [PLN Planning/CEQA](#)  
**Subject:** Mission Bay Park Master Plan – Fiesta Island Amendment (Project No. 562189 / SCH No. 2017051034)  
**Date:** Monday, December 10, 2018 2:32:40 PM

---

PROJECT NAME: Mission Bay Park Master Plan – Fiesta Island Amendment  
PROJECT No.: 562189 / SCH No. 2017051034  
COMMUNITY AREA: Mission Bay Park  
COUNCIL DISTRICT: 2 (Campbell)

I-1 | Hello,  
I want to make sure that there is still a large off leash area with access for swimming in the bay by the dogs. This is the only place in the city where dogs can train and retrieve in the water without worrying about waves.

--

**Melissa Chavarro (formerly Melissa Morrell)**

Please consider the environment before printing emails.

## 2. Response to Comments

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## 2. Response to Comments

### I. Response to Comments from Melissa Chavarro, dated December 10, 2018.

I-1           The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

### LETTER J – Chelsea Gastelum (2 pages)

**From:** Chelsea Gastelum  
**To:** [PLN Planning/CEQA](#)  
**Subject:** PROJECT NAME: Mission Bay Park Master Plan – Fiesta Island Amendment PROJECT No.: 562189 / SCH No. 2017051034 COMMUNITY AREA: Mission Bay Park  
**Date:** Monday, December 10, 2018 3:33:09 PM

PROJECT NAME: Mission Bay Park Master Plan – Fiesta Island Amendment  
PROJECT No.: 562189 / SCH No. 2017051034 COMMUNITY AREA: Mission Bay Park

- J-1 | I am a regular Fiesta Island visitor. I am there 5-7 days a week year round. I am there because I take my dog, and I utilize more than just the fenced in dog park area. I really feel the city needs to do some more evaluating before spending the time and money for the type of development that is being proposed.
- J-2 | Currently there is very little over-sight of Fiesta Island. I would like a better understanding of how that is supposed to change with it being developed to attract more people. Currently it is volunteers, mostly those of us with dogs, that help pick up trash on the island. People come and off-road, speed, drink and party, bonfire (including outside of fire pits and often with toxic items) and just leave trash everywhere. The plan says that the city Parks and Rec department would be responsible for up-keep, but maybe people haven't been to some of our other parks lately. Most of the parks and beach and bay parking lot need maintenance, and in many cases whole new parking lots. This is part of up-keep, and it is not something Parks and Recs does. Tax dollars spent on an area that doesn't need major development when they could be used to fix the places we already have seems like a waste.
- J-3 | I love the idea of restoring the wetlands on the North side of the Island. An observation deck out there would be great as well. A lot of improvement can be made with just some clean up and repairs of existing areas out on the island.
- J-4 | The current fenced in dog park needs very little improvement. It does not need any space taken away for a children's play area and parking lot inside the existing area. The only reason it may need a parking lot outside of the area is because of the way off-roaders love to go mudding after it rains. Would restrooms out there be nice? Sure, but would they be designed to think of the solo person out there with a dog? Yes, doggie water fountains would be nice, but not at the expense of having an entire park area put in there. There doesn't need to be a swimming area in there because there are plenty of other places to swim on so many of the other waterfront area of the bay.
- J-5 | I would also like a better understanding of how the City plans on handling the use of the island for competitive cyclists. I understand that there is talk of different pathways for pedestrians and cyclists, but that is more the recreational cyclists. What is the plan for the professional athletes that practice out there?
- J-6 | Personally, Fiesta Island is the perfect place to take my dog off-leash and enjoy so much of nature. After our recent rain the grasses are starting to return to the interior areas of the island. This brings more birds to watch, which is always fun. One of my favorites is when I spot burrowing owls in the small dirt hills. The hawks and falcons gliding above are so majestic. I love watching the wildflowers bloom and the butterflies and dragonflies flitting by.... It is a beautiful, serene place with the hustle and bustle of the world all around it. I visit in every season, in most weather. (Torrential downpours and I'm out. LOL!) I visit mornings, mid-day and at night, especially with the shorter winter months. My dog goes to

## 2. Response to Comments

J-6 | work with me and it is where I take her at lunch for exercise, and am often right back there in  
cont'd | the evening before heading home.

J-7 | Currently Fiesta Island is known as a place to take dogs. Those areas are getting smaller and  
smaller with more and more people complaining about off-leash dogs in other places. Dog  
owners cannot walk on most beaches after 9am with their dogs. Dogs need open, off leash  
spaces. There are kid parks all over San Diego. There are small dog parks all over San  
Diego. There are plenty of developed places to swim in the Mission Bay area. There are very  
few places where large dogs, bird dogs, young dogs who need to run off energy, and other  
dogs who need a lot of space to roam free can do it. There are also less and less natural spaces  
in San Diego, and the ones we have want dogs to be on a leash. Mixing more people who are  
not there with dogs also causes the potential for safety issues because they often don't know  
how to behave around dogs or feel they getting priority over an "animal." Taking the time and  
money to develop an area that can be ruined with sand in sinks and water fountains, another  
place to worry about vagrant vandalism, and more area to fix potholes isn't needed until the  
J-8 | City of San Diego can show they can do it to the developed areas we have now. And if it is  
going to be developed, then a better plan of how to patrol it and keep it nice should be  
provided.

J-9 | The City would be smart to advertise to vacationers who have dogs, want to vacation with  
their dogs, and would love to know they have such a wonderful place to have their dogs run  
free. We are a tourist destination, and reaching a different segment of vacationer could be  
valuable. I like to take my dog with me on vacation. It is so frustrating when places have no  
off-leash area, too small of an off-leash dog park or dogs are relegated to being on leashes in  
parking lots. If I find a dog friendly place, I go. If I find areas with open spaces for dogs to  
roam free, I go. This is a marketing tool.

J-10 | I implore the City to carefully take the parts of the plans that help preserve nature and scrap  
the rest that just brings in too many people and concrete developments. Please don't pave  
paradise and put up a parking lot.

Sincerely,  
Chelsea Gastelum

## 2. Response to Comments

### J. Response to Comments from Chelsea Gastelum, dated December 10, 2018.

- J-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- J-2 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review. The City's Parks and Recreation Department would continue to be responsible for monitoring and upkeep of parks in the City.
- J-3 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- J-4 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- J-5 The project does not differentiate between professional and recreational cyclists use of the proposed multi-use paths on the island.
- J-6 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- J-7 Dog and human interaction safety is not a CEQA issue, and is an existing condition on Fiesta Island. Therefore, no further response is necessary.
- J-8 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- J-9 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- J-10 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.

## 2. Response to Comments

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## 2. Response to Comments

### LETTER K – Ashley Whittke (1 page)

**From:** Ashley Whittke  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** Mission Bay Park Master Plan – Fiesta Island Amenment #562189  
**Date:** Monday, December 10, 2018 6:09:34 PM

---

Hello,

K-1 | I support "Option B" of the Mission Bay Park Master Plan as it leaves the current fenced area for off-leash dogs and their owners largely intact. As a dog owner and resident of San Diego, I appreciate the natural, open character of Fiesta Island's "Southwest Subarea" and do not want to see a road or paved parking lots constructed within it. "Option A" would turn the area into a more developed park with reduced off-leash opportunities. If the road proposed in "Option A" was constructed, it would bring more vehicles, many of which would be RV's or towing boats, into the middle of the off-leash recreation area, posing a safety concern and degrading the natural character of the park. I appreciate the City's consideration of the open space needs of its residents and commitment to preserving the unique character of Fiesta Island. "Option B" is a good compromise, as it locates the road and parking lots towards the edge of the fenced off-leash area and preserves the natural, open character of the park.

K-2 |

K-3 |

Thank you,

Ashley Wittke

## 2. Response to Comments

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## 2. Response to Comments

### **K. Response to Comments from Ashley Whittke, dated December 10, 2018.**

K-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.

K-2 Traffic as a result of the proposed project is discussed in Section 5.9 Transportation/Circulation. See response to comment H-2.

K-3 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER L – Sarah Gerhard (1 page)

**From:** sarah gerhard  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** Fiesta island - Option B  
**Date:** Monday, December 10, 2018 6:13:08 PM

---

- L-1 I support "Option B" of the Mission Bay Park Master Plan as it leaves the current fenced area for off-leash dogs and their owners largely intact. As a dog owner and resident of San Diego, I appreciate the natural, open character of Fiesta Island's "Southwest Subarea" and do not want to see a road or paved parking lots constructed within it.
- L-2 "Option A" would turn the area into a more developed park with reduced off-leash opportunities. If the road proposed in "Option A" was constructed, it would bring more vehicles, many of which would be RV's or towing boats, into the middle of the off-leash recreation area, posing a safety concern and degrading the natural character of the park. I appreciate the City's consideration of the open space needs of its residents and commitment to preserving the unique character of Fiesta Island. "Option B" is a good compromise, as it locates the road and parking lots
- L-3 towards the edge of the fenced off-leash area and preserves the natural, open character of the park.

Thank you and Happy holidays  
-sarah

Sent from my iPhone

## 2. Response to Comments

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## 2. Response to Comments

### **L. Response to Comments from Sarah Gerhard, dated December 10, 2018.**

L-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.

L-2 Traffic as a result of the proposed project is discussed in Section 5.9 Transportation/Circulation. See response to comment H-2.

L-3 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

### LETTER M – Susanne Slater (1 page)

**From:** Susanne Slater  
**To:** [PlN\\_PlanningCEQA](#)  
**Subject:** Mission Bay Park Master Plan Fiesta Island Amendment. # 562189  
**Date:** Monday, December 17, 2018 5:16:59 PM

---

M-1 | Rebecca, I have read over the proposed plans for Fiesta Island and feel a deep sadness at the threat of losing one of our remaining untouched areas. I have lived in San Diego since 1983 and have enjoyed having a space without multiple restrictions. I don't know the reason behind all of these changes, but will miss the feeling of freedom we all experience when walking along the beaches with our dogs. There is a strong sense of community among the regular users of the Island and many of us will be forced to retreat to our neighborhoods for dog walking. Small fenced in dog areas are not enough exercise for a dog or its owners.

M-2 | I'm also concerned about the enormous amount of money this is going to cost. In my opinion, San Diego could prioritize the spending of our tax dollars better. We have to take care of our homeless before developing new parks

Thanks for listening,  
Susanne Slater

Sent from my iPad

## 2. Response to Comments

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## 2. Response to Comments

### **M. Response to Comments from Susanne Slater, dated December 17, 2018.**

- M-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- M-2 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER N – Viejas Tribe (1 page)

		P.O. Box 908 Alpine, CA 91903 #1 Viejas Grade Road Alpine, CA 91901
December 19, 2018		Phone: 6194453810 Fax: 6194455337 viejas.com
<p>Rebecca Malone Environmental Planner City of San Diego 9485 Aero Dr., MS 413 San Diego, CA 92123</p> <p><b>RE: Project No. 562189</b></p>		
<p>Dear Ms. Malone,</p>		
N-1	<p>In reviewing the above referenced project the Viejas Band of Kumeyaay Indians ("Viejas") would like to comment at this time.</p>	
N-1	<p>The project area may contain many sacred sites to the Kumeyaay people. We request that these sacred sites be avoided with adequate buffer zones.</p>	
<p>Additionally, Viejas is requesting, as appropriate, the following:</p>		
N-2	<ul style="list-style-type: none"><li>• All NEPA/CEQA/NAGPRA laws be followed</li><li>• Immediately contact Viejas on any changes or inadvertent discoveries.</li></ul>	
N-2	<p>Thank you for your collaboration and support in preserving our Tribal cultural resources. I look forward to hearing from you. Please call me at 619-659-2312 or Ernest Pingleton at 619-659-2314, or email, <a href="mailto:rteran@viejas-nsn.gov">rteran@viejas-nsn.gov</a> or <a href="mailto:epingleton@viejas-nsn.gov">epingleton@viejas-nsn.gov</a>, for scheduling. Thank you.</p>	
<p>Sincerely,</p> 		
<p>Ray Teran, Resource Management VIEJAS BAND OF KUMEYAAY INDIANS</p>		

## 2. Response to Comments

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## 2. Response to Comments

### **N. Response to Comments from Viejas Tribe, dated December 19, 2018.**

- N-1 See Chapter 8, *Effects Found Not to be Significant*, which determined that given that the project site was heavily disturbed during hydraulic dredging and land creation, and because a records search returned negative results, implementation of the project would not result in impacts to tribal cultural resources.
- N-2 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review.

## 2. Response to Comments

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## 2. Response to Comments

LETTER O – Dave Thompson (1 page)

**From:** Dave.Thompson  
**To:** [PLN\\_PlanningCEQA](#)  
**Cc:** "Linda"  
**Subject:** Fiesta Island Dog Park  
**Date:** Saturday, December 22, 2018 9:13:53 AM

---

Hi Rebecca

O-1

My wife, our sons, and our dogs have been using Fiesta Island's dog park for virtually every day now over the past 10 years. We find it truly one of the most remarkable aspects of our great city – where else can you find this joy, serenity, and community gathering this close to a major downtown area?

O-2

Our preference is that the city would do absolutely nothing to the area – we do not need more roads, lifeguard stations, parking areas etc. There is a beautiful parking area, paddle board launch area and covered pavilion right across the water on the Sea World side which no one ever uses! Why do we need another one?

As a city, we have two enormous issues – road quality and the homeless, we should be spending our limited resources on these much higher priorities!

As your taxpayers, regards,  
Dave

**Dave Thompson**

[Redacted signature block]

## 2. Response to Comments

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## 2. Response to Comments

**O. Response to Comments from Dave Thompson, dated December 22, 2018.**

- O-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- O-2 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER P – Carolyn McClain (1 page)

**From:** Carolyn McClain  
**To:** [PLN Planning/CFQA](#)  
**Cc:** [Fred McClain](#)  
**Subject:** Mission Bay Park Master Plan - Fiesta Island Amendment and Number: 562189  
**Date:** Wednesday, January 02, 2019 8:31:19 AM

---

Dear Planners:

P-1 | We are frequent visitors to Fiesta Island’s wonderful, vast dog park. We have carefully reviewed the PEIR draft and **we strongly support option b.**

P-2 | Our biggest objection is the notion of cutting a road through the current fenced dog area for the PWC launch and storage. Slicing such a huge portion of the dog area is a big negative. But even bigger is the fact that this plan then destroys one of the most used walking tracks. Along with many visitors, we make a circular route from the entry gate, past the fenced tern areas, along the shore at Hidden Anchorage. Hidden Anchorage is one of the most popular areas for dogs to swim and chase balls, in part because the waves there are very mild. Our own dog taught himself to swim there, experimenting week after week.

The circuit that we walk is a nice length for exercise for us as people and for our dog. It would be a huge loss for us to have our walks blocked by (presumably) a chain link fence that forces us off the beach.

P-3 | Another factor is this: because Fiesta Island is such a magnet for us and others that live outside San Diego city limits. We drive (like one of our neighbors) to the Island each week. We usually pick up a meal at one of the SD restaurants. If Fiesta Island is no longer a magnet for us, we will not be bringing our business there.

Please support Plan B for those of us who frequent the dog park.

Carolyn

## 2. Response to Comments

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## 2. Response to Comments

**P. Response to Comments from Carolyn McClain, dated January 2, 2019.**

- P-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- P-2 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- P-3 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER Q – Mike Dicerbo (2 pages)

**From:** Mike D  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** Fiesta Island Options A/B Comment  
**Date:** Thursday, January 03, 2019 7:27:51 AM

Date: Jan 3rd, 2019.

Hi,  
My name is Mike Dicerbo, Pacific Beach resident since 2013. Please include my comments for review at the upcoming meeting. I strongly support Option B for the dog park area.



The peninsula bordered by hidden Anchorage and South Passage is without a doubt the most peaceful area of the park. Option A wants to pave a parking lot on it !? Of all of massive

## 2. Response to Comments

Q-1  
cont'd

acreage on fiesta island suitable for parking lots this has got to be the WORST area. Vehicular access is NOT NEEDED in that location. It would spoil that section of beach, disrupt the open, pedestrian flow of the most FAMOUS dog park in America, and put more cars and people where we don't want them. The park's master plan means for it to be a refuge from the crowded city. We are an active city, we can handle walking from the northern lot!! If a paved path is needed for handicap access than make one, but additional roads and fences will spoil this area. We've already paved and developed San Diego's coast more than enough, let's not wreck the last bit of peace left in our city. The existing dog park peninsula is the best park of the island, let's leave it alone!

Thank you for your time and consideration.

Sincerely,

Mike Dicerbo

--

Mike Dicerbo

Direct: [REDACTED]

Friction Jewelry Inc

Online Shop: [www.frictionjewelry.com](http://www.frictionjewelry.com)

Etsy Shop: [www.etsy.com/shop/frictionjewelryUSA](http://www.etsy.com/shop/frictionjewelryUSA)

[www.instagram.com/frictionjewelry](http://www.instagram.com/frictionjewelry)

[www.facebook.com/frictionjewelry](http://www.facebook.com/frictionjewelry)

## 2. Response to Comments

**Q. Response to Comments from Mike Dicerbo, dated January 3, 2019.**

Q-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER R – Sarah Shreves (1 page)

**From:** Sarah Shreves  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** Mission Bay Park Master Plan Fiesta Island Amendment and Number: 562189  
**Date:** Thursday, January 03, 2019 9:10:58 AM

---

Rebecca to whom it may concern

R-1 | As a dog owner I support Option B - to keep Fiesta a dog park, off leash space for our pups! Thanks for listening.

--

**Sarah Shreves**  
**Integrative Wellness + Life Coach**  
[www.sarahshreves.com](http://www.sarahshreves.com) | [REDACTED]  
[Instagram](#) | [To be green is to go deeper](#)

*For Scheduling please use [this link](#) Emails are checked once daily. If you require urgent assistance please text at the above number. Here's to intentional times of rest and work.*

## 2. Response to Comments

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## 2. Response to Comments

### **R. Response to Comments from Sarah Shreves, dated January 3, 2019.**

R-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

### LETTER S – Annemarie Keating (1 page)

**From:** Spirit of Adventure  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** Mission Bay Park Master Plan Fiesta Island Amendment and Number: 562189  
**Date:** Thursday, January 03, 2019 2:36:13 PM

---

To whom it may concern

- S-1 Please consider keeping Fiesta Island the way it is.
- Thousands of people can enjoy it pursuing many different activities, some of which will no longer be possible once it's changed.
- S-2
- Maintenance cost are minimal and no precious water is wasted.
  - No other city can boast of a place like this: Families can enjoy nature. Birds, bugs, rabbits, plants etc. They can see that one good rain changes the landscape from brown to green.
- S-3
- Sadly, many kid's outdoor experience is limited to groomed, compartmentalized parks with uninspiring playgrounds. Don't turn Fiesta Island into another one...

Our family has enjoyed Fiesta Island for almost 30 years. With it's minimal restrictions, it's the last place that allows it's users a bit of the freedom.

Thank you.

Sincerely,

Annemarie Keating  
[REDACTED]  
San Diego, CA 92106

## 2. Response to Comments

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## 2. Response to Comments

### S. Response to Comments from Annemarie Keating, dated January 3, 2019.

- S-1 See Chapter 9, *Alternatives to the Proposed Project*, which analyzed the Existing Condition alternative. The Existing Condition Alternative did not meet most of the basic project alternatives, and is therefore less desirable than the proposed project.
- S-2 See response to S-1, above. The comment does not address the adequacy of the PEIR as it relates to CEQA.
- S-3 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER T – Ashley Berg (2 pages)

**From:** Ashley Berg  
**To:** [PLN PlanningCEQA](#)  
**Subject:** Mission Bay Park Master Plan - Fiesta Island Amendment No: 562189/SCH No. 20177051034  
**Date:** Friday, January 04, 2019 9:47:58 AM

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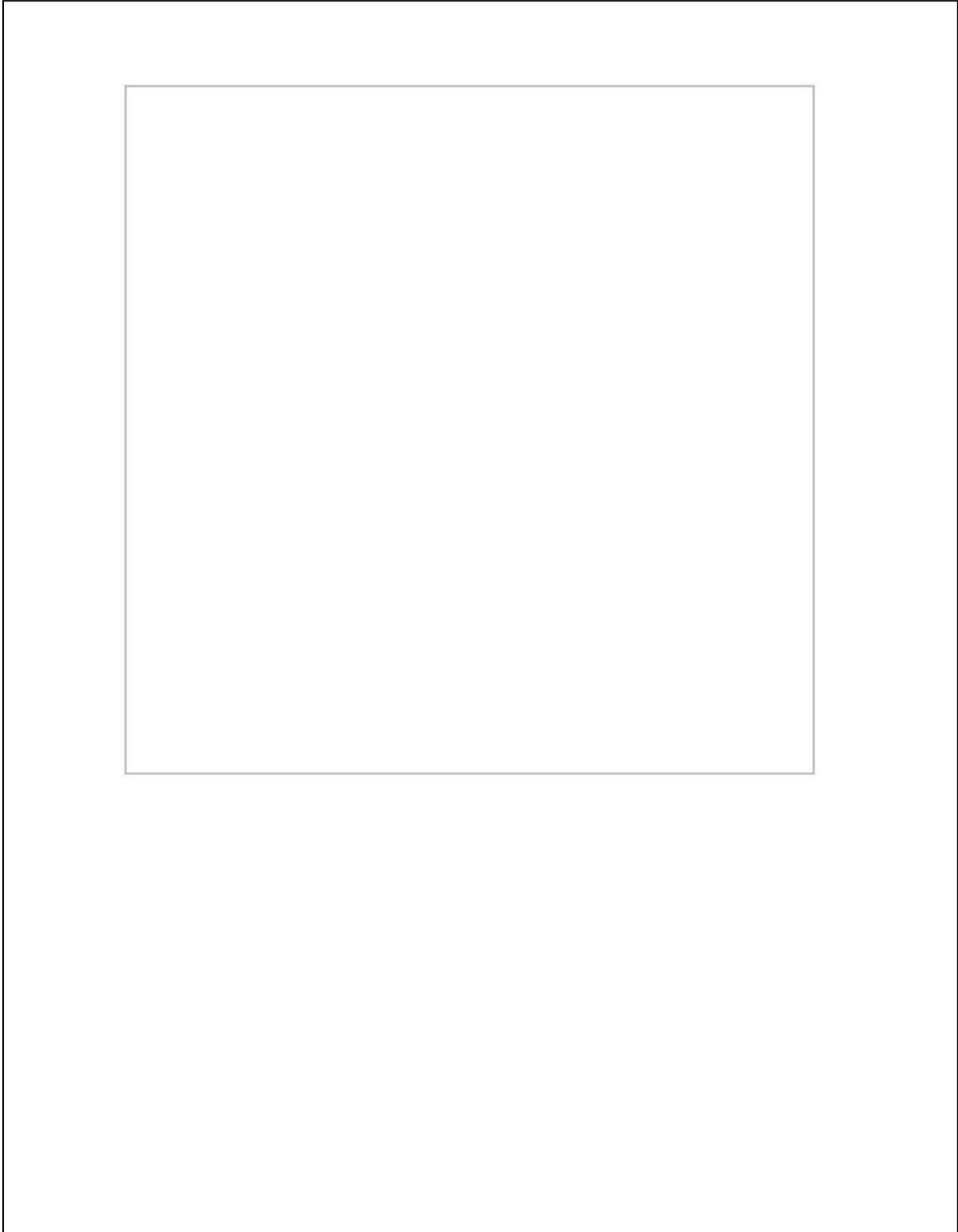
T-1 | I'd like to voice my support for Plan B, which maintains the Fiesta Island dog park. This is an important and often-used recreational area and it would be a loss to develop it entirely.

--

 **Ashley Berg**  
*Senior Staff Writer*  
P. (858) 200-0044  
F. (858) 200-0040  
[ashley@rosemontmedia.com](mailto:ashley@rosemontmedia.com)  
[www.rosemontmedia.com](http://www.rosemontmedia.com)  
[www.rosemontmedia.com/blog](http://www.rosemontmedia.com/blog)

## 2. Response to Comments



## 2. Response to Comments

### **T. Response to Comments from Ashley Berg, dated January 4, 2019.**

T-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER U – Cheance Adair (1 page)

**From:** Cheance Adair  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** Mission Bay Park Master Plan – Fiesta Island Amendment PROJECT No.: 562189 / SCH No. 2017051034  
**Date:** Tuesday, January 08, 2019 2:53:52 PM

---

U-1

As an avid user of Mission Bay for human powered water sports, as well as an island user for dog-walking, I wholly support and encourage you to accept **OPTION A**

It supports multiple users access to the island, and is most fair

-cheance adair

San Diego 92104

--

**Postage rates INCREASE January 27, 2019**

University Of San Diego Mail Center  
Monday - Friday 8am-5pm

-If you're inquiring about a package, its best to have a tracking number!

## 2. Response to Comments

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## 2. Response to Comments

### U. **Response to Comments from Cheance Adair, dated January 8, 2019.**

U-1           The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

### LETTER V – Michael Candra (1 page)

**From:** Michael Candra  
**To:** [PLN Planning/CEQA](#)  
**Subject:** PROJECT NAME: Mission Bay Park Master Plan – Fiesta Island Amendment PROJECT No.: 562189 / SCH No. 2017051034  
**Date:** Tuesday, January 08, 2019 9:54:07 PM

---

Dear Rebecca Malone-

V-1 | After attending the Mission Bay Park Committee tonight I feel that I must write to you to express my concerns over the numerous detrimental environmental impacts that will occur should a non-motorized personal water craft storage and launch facility with access road be added to the South-West Island Area as per Option A which was discussed and only partially tabled tonight by the Mission Bay Park Committee.

V-2 | My environmental concerns with Option A are the following:  
V-3 | 1. Increased water usage for landscaped areas as well as rinsing of non-motorized PWC and users.  
V-4 | 2. Increased polluted run-off from the planned access road and parking lot that will likely run directly into the bay when it rains.  
V-5 | 3. Increased emissions from vehicles using the planned access road.  
V-5 | 4. Increased noise pollution from the traffic on the planned access road.

V-6 | There is currently ZERO water consumed by the South-West Island Area. It goes without saying that reducing our water consumption is the right thing to do.

V-7 | Run-off from roads and parking lots already closes our beaches multiple times every year. Decreasing the amount of permeable land even being considered is a bad but directly adjacent to an area where people fish and where endangered species such as the Least Tern come to nest seems especially egregious.

V-8 | There is currently essentially zero automobile exhaust emissions in the South-West Island Area. Thankfully the world is beginning to take environmental issues seriously so an exponential increase in emissions in this area is simply irresponsible

V-9 | It is important to remember that this is the only part of Fiesta Island that has nearly zero vehicular traffic (excepting the vehicles necessarily used by the city employees in their daily duties). The peace and quiet of the South-West Island Area is enjoyed by hundreds if not thousands of San Diego residents, and their dogs, every single day. This is truly a treasure in our big city and to bisect this area with a road would not be an environmentally responsible decision.

V-10 | **Option B, which preserves the South-West Island Area nearly as-is is the best option moving forward for the environment, the resident and visiting users of Fiesta Island, and the city of San Diego.**

Thank you for your time in reading my concerns and I hope that good decisions are made so that when complete, Fiesta Island is another jewel in our treasure of a city.

Sincerely,

Michael Candra

## 2. Response to Comments

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## 2. Response to Comments

### V. Response to Comments from Michael Candra, dated January 8, 2019.

- V-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- V-2 See Section 2.1 of the FEIR, *Master Response for Program EIR*, which explains that the proposed project is a Program-level analysis, and future development at the site would be subject to individual environmental review. Additionally, see Section 5.10, *Public Utilities*, which addresses water supply.
- V-3 See Section 5.5, *Hydrology and Water Quality*, of the PEIR, which analyzes project-related impacts to water quality. Future development per the proposed project would be required to adhere to the requirements of the City’s Drainage Design Manual and Storm Water Standards Manual, which require installation of low-impact development (LID) practices, such as bioretention areas, pervious pavements, etc., which would improve surface drainage and not exacerbate flooding or cause erosion.
- V-4 See Section 5.1, *Air Quality and Odor*, and Section 5.4, *Greenhouse Gas Emissions*, of the PEIR, which address increased emissions from projected increase in vehicles as a result of project implementation. As shown in these sections, air quality and GHG emissions impacts from both Options A and B would be less than significant.
- V-5 See Section 5.7, *Noise*, of the PEIR, which addressed project-related noise estimated for the proposed improvements. Future development would be subject to additional environmental impact analysis (see response to V-2, above.)
- V-6 As provided in Section 5.10, *Public Utilities*, the project would not result in a significant impact to water use. Future development would be required to comply with construction and design criteria outline in the City’s Water Design Guidelines, as well as other applicable City, state, and federal regulations.
- V-7 See response to V-2 and V-3, above.
- V-8 See response to V-2 and V-4, above.
- V-9 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- V-10 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER W – Faye Sherman (1 page)

**From:** Faye Sherman  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** PROJECT 562189 SCH 2017051034  
**Date:** Wednesday, January 09, 2019 10:46:57 AM

---

W-1 | Please pass Plan B for the Mission Bay Park Master Plan Fiesta Island Amendment  
Helene Sherman

## 2. Response to Comments

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## 2. Response to Comments

### **W. Response to Comments from Faye Sherman, dated January 9, 2019.**

W-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

### LETTER X – Clifford Weiler (1 page)

**From:** [REDACTED]  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** Mission bay park master plan-Fiesta Island Amendment. Project 562189/SCH No. 2017051034  
**Date:** Friday, January 11, 2019 4:24:32 PM

---

X-1

I am not sure this is the time or means to state this but it seems that any PEIR would include safety within the parameters of environmental impacts. Half jokingly, my comments relate to keeping human blood out of the bay.

To allow paddlers to use a launch ramp or storage area which would cause interactions with jet skiers and/or other motorized ester craft such as in the south or south east area of Mission Bay is gross negligence as it results in accidents waiting to happen. I am not opposed to paddlers but believe there are more responsible and appropriate places for their launch. But the proposed Option A (?) places them in a direct path of the jet skiers as well as other launchings of motor crafts.

Sent from my iPhone

## 2. Response to Comments

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## 2. Response to Comments

### X. **Response to Comments from Clifford Weiler, dated January 11, 2019.**

X-1           The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

LETTER Y – Denise Meisner (2 pages)

	<p><b>From:</b> Denise Meisner <b>To:</b> <a href="#">PLN_PlanningCFOA</a> <b>Subject:</b> Mission Bay Park Master Plan – Fiesta Island Amendment PROJECT No.: 562189 / SCH No. 2017051034 <b>Date:</b> Friday, January 11, 2019 4:35:10 PM</p> <hr/>
Y-1	<p>While there are over 40,000 acres of public parkland in San Diego, only about 40 to 50 acres outside of Fiesta Island are designated for off-leash use. Nearly 45 percent of all homes have a dog and there are currently almost 800,000 dogs in San Diego County. It is reasonable to preserve the 90 acres on Fiesta Island for off-leash use by the thousands of current and future people who use it 365 days a year.</p>
Y-2	<p>This area is a human exercise area! Everyone there is walking, running, bicycling or swimming with their leash-free dogs. Humans need an open, undeveloped space to exercise and many people without dogs also enjoy this area. We simply do not have to develop every acre of public parkland in order to enjoy it.</p>
Y-3	<p>This area is unique: it is the only area where people can enjoy limited solitude in the middle of a developed city. The Mission Bay Master Plan includes this statement: "As an open landscape, Fiesta Island should be the place where city residents and visitors alike find the ultimate refuge from urban congestion, noise, and visual clutter". This is what maintaining our fenced off-leash area can help to provide. We need some open space!</p>
Y-4	<p>Dogs play a large role in today's culture. We need a space where they can be exercised and socialized, making them better canine citizens. It is also important to remember the economic impact that dog ownership has on our community, bringing visitors to San Diego who will utilize other services while here. Pet ownership in the U.S. generates \$221 billion each year in food, veterinary care, and other services as well as creating hundreds of thousands of jobs in all of the related fields. The estimated San Diego economic impact is \$1.2 billion/year.</p>
Y-5	<p>As an indication as to how popular this area is, here is a list of awards the off-leash area has won in just the last year:</p> <ul style="list-style-type: none"><li>USA Today - #1 Best Dog Beach in the U.S.</li><li>San Diego Humane Society - #1 Best Dog Beach in San Diego</li><li>Dogster Magazine - One of the Top 14 Dog Beaches in the U.S.</li><li>Dog Time Magazine - #1 Best Dog Beach in the U.S.</li></ul> <p>While I do not like any development of this beautiful Gem in the middle of this wonderful city. That island is highly used and has a minimum expense base to maintain.</p>

## 2. Response to Comments

- At this time, there are two plans - the city's plan -- Option A, and Option B.
- Why I am against the city's plan, option a:
- The road through the area will divide the off-leash area, making it less usable for human and canine exercise purposes and much more dangerous as dogs and humans try to cross the road. This road is needed to serve a proposed paddle boat storage and event area at the south end of the fenced area.
- Y-6 A paddle boat facility in this location within the off-leash area will require an expensive infrastructure (the bisecting access road, fencing, a parking lot, bathrooms, a new swimming beach, etc.). These amenities already exist across the channel on South Shores and are severely underutilized there. In 2006, the paddlers provided the planners with a list of infrastructure it needed for its site and listed South Shores as a possible location. FIDO spent days creating a matrix using the paddler's criteria to see if other locations in Mission Bay could also accommodate the paddle site. It clearly showed that while South Shores had almost ALL of their needs already in place, Fiesta Island had NONE of these and that South Shores or Mariners Point were their best options.
- Y-7 The city's plan includes grass and expensive facilities that will cost millions of dollars to build and high ongoing maintenance costs. The FIDO Smart Growth/Sustainable Plan, Option B, is less expensive to build, does not include grass and has no expensive infrastructure to maintain.
- Y-8 **While I do not like any development of this beautiful Gem in the middle of this wonderful city. That island is highly used and has a minimum expense base to maintain.**
- If I have to choose between the lesser of two evils I prefer option B.**

[Denise Miesner](#) - [REDACTED]

[REDACTED]  
San Diego, Ca 92107

[REDACTED]

[www.MilaMiesner.com](http://www.MilaMiesner.com)  
<https://www.facebook.com/MilaMiesner/>

## 2. Response to Comments

### **Y. Response to Comments from Denise Meisner, dated January 11, 2019.**

- Y-1 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- Y-2 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- Y-3 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- Y-4 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- Y-5 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- Y-6 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- Y-7 The comment does not address the adequacy of the PEIR as it relates to CEQA.
- Y-8 The comment does not address the adequacy of the PEIR as it relates to CEQA.

## 2. Response to Comments

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## 2. Response to Comments

### LETTER Z – No Name (2 pages)

While there are over 40,000 acres of public parkland in San Diego, only about 40 to 50 acres outside of Fiesta Island are designated for off-leash use. Nearly 45 percent of all homes have a dog and there are currently almost 800,000 dogs in San Diego County. It is reasonable to preserve the 90 acres on Fiesta Island for off-leash use by the thousands of current and future people who use it 365 days a year.

This area is a human exercise area! Everyone there is walking, running, bicycling or swimming with their leash-free dogs. Humans need an open, undeveloped space to exercise and many people without dogs also enjoy this area. We simply do not have to develop every acre of public parkland in order to enjoy it.

This area is unique: it is the only area where people can enjoy limited solitude in the middle of a developed city. The Mission Bay Master Plan includes this statement: "As an open landscape, Fiesta Island should be the place where city residents and visitors alike find the ultimate refuge from urban congestion, noise, and visual clutter". This is what maintaining our fenced off-leash area can help to provide. We need some open space!

Z-1 Dogs play a large role in today's culture. We need a space where they can be exercised and socialized, making them better canine citizens. It is also important to remember the economic impact that dog ownership has on our community, bringing visitors to San Diego who will utilize other services while here. Pet ownership in the U.S. generates \$221 billion each year in food, veterinary care, and other services as well as creating hundreds of thousands of jobs in all of the related fields. The estimated San Diego economic impact is \$1.2 billion/year.

As an indication as to how popular this area is, here is a list of awards the off-leash area has won in just the last year:

USA Today - #1 Best Dog Beach in the U.S.

San Diego Humane Society - #1 Best Dog Beach in San Diego

Dogster Magazine - One of the Top 14 Dog Beaches in the U.S.

Dog Time Magazine - #1 Best Dog Beach in the U.S.

## 2. Response to Comments

Z-1  
cont'd

While I do not like any development of this beautiful Gem in the middle of this wonderful city. That island is highly used and has a minimum expense base to maintain.

At this time, there are two plans - the city's plan -- Option A, and Option B.

Why I am against the city's plan, option a:

The road through the area will divide the off-leash area, making it less usable for human and canine exercise purposes and much more dangerous as dogs and humans try to cross the road. This road is needed to serve a proposed paddle boat storage and event area at the south end of the fenced area.

A paddle boat facility in this location within the off-leash area will require an expensive infrastructure (the bisecting access road, fencing, a parking lot, bathrooms, a new swimming beach, etc.). These amenities already exist across the channel on South Shores and are severely underutilized there. In 2006, the paddlers provided the planners with a list of infrastructure it needed for its site and listed South Shores as a possible location. FIDO spent days creating a matrix using the paddler's criteria to see if other locations in Mission Bay could also accommodate the paddle site. It clearly showed that while South Shores had almost ALL of their needs already in place, Fiesta Island had NONE of these and that South Shores or Mariners Point were their best options.

The city's plan includes grass and expensive facilities that will cost millions of dollars to build and high ongoing maintenance costs. The FIDO Smart Growth/Sustainable Plan, Option B, is less expensive to build, does not include grass and has no expensive infrastructure to maintain.

While I do not like any development of this beautiful Gem in the middle of this wonderful city. That island is highly used and has a minimum expense base to maintain.

If I have to choose between the lesser of two evils I prefer option B.

## 2. Response to Comments

### **Z. Response to Comments from No Name, dated Not Dated.**

Z-1 Comment letter Z is the same as comment letter Y. Please see responses to Y1 – Y8, above.

## 2. Response to Comments

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3. Revisions to the Draft PEIR

# 3. Revisions to the Draft PEIR

## 3.1 INTRODUCTION

This chapter contains revisions to the PEIR based upon (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of PEIR publication; and/or (3) typographical errors. This chapter also includes additional mitigation measures to fully respond to commenter concerns as well as provide additional clarification to mitigation requirements included in the PEIR. The provision of these additional mitigation measures does not alter any impact significance conclusions as disclosed in the PEIR. Changes made to the PEIR are identified here in ~~strikeout text~~ to indicate deletions and in underlined text to signify additions.

## 3.2 PEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS

The following text has been revised in response to comments received on the PEIR.

Page 5.2-19, Section 5.2, *Biological Resources*. Table 5.2-6 has been updated to clarify a calculation of total impacts to waters in response to Comment AP-3.

**Table 5.2-6 Potential Impacts to Jurisdictional Waters and Wetlands, Acres Option A and B**

Habitat	Option A			Option B		
	Permanent	Temporary	Total	Permanent	Temporary	Total
<b>Impacts to Jurisdictional Wetlands</b>						
Southern coastal salt marsh	0.55	0.66	1.21	0.55	0.66	1.21
<b>Impacts to Waters</b>						
Saltpan/mudflats	0.50	3.03	3.53	0.50	3.03	3.53
Open Water	0.04	10.21	10.25	0.00	10.21	10.21
Eelgrass beds	0.04	10.21	10.25	0.00	10.21	10.21
Beach	0.08	5.75	5.83	0.07	5.75	5.82
<b>Total</b>	<b>0.66</b>	<b>29.2</b>	<b><u>29.86</u></b> <del>49.64</del>	<b>0.57</b>	<b>29.2</b>	<b>29.77</b>
<b>Total, Jurisdictional Waters and Wetlands</b>	<b>1.21</b>	<b>29.86</b>	<b><u>31.07</u></b> <del>29.86</del>	<b>1.12</b>	<b>29.86</b>	<b>30.98</b>

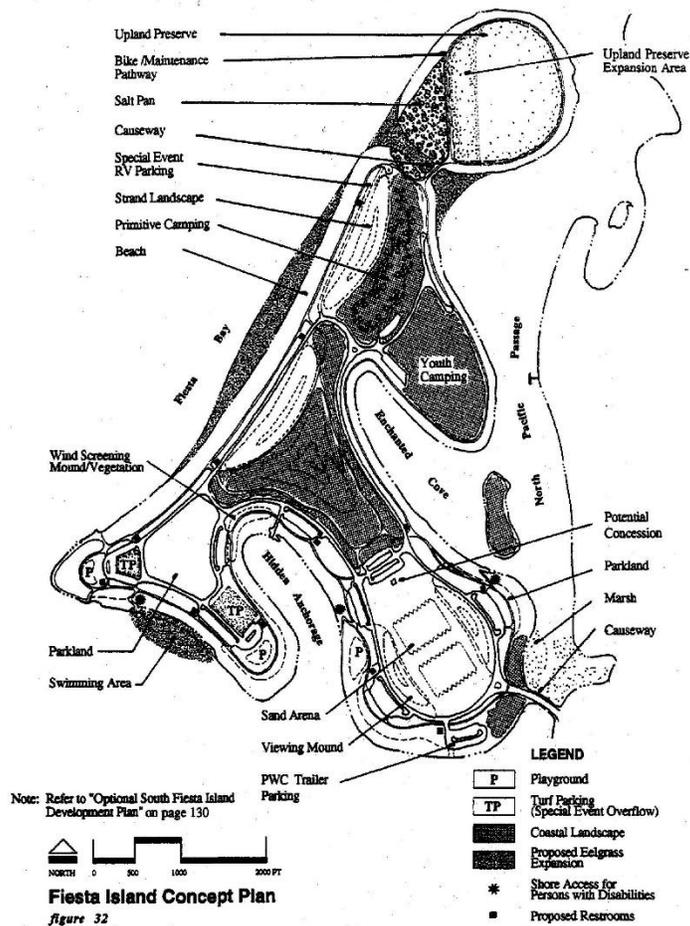
Source: Alden 2017.

### 3. Revisions to the Draft PEIR

Chapter 2, *Environmental Setting*. Figure 2-3 has been replaced to show the Adopted Fiesta Island Concept Plan, and to clarify that they represent the same adopted Fiesta Island Concept Plan in response to Comment AX-17.

### 2. Environmental Setting

Figure 2-3 Adopted Fiesta Island Concept Plan



Source: City of San Diego

December 2018

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### 3. Revisions to the Draft PEIR

Page 2-25, Chapter 2, *Environmental Setting*. Table 2-4 has been updated to clarify a calculation of total impacts to wetland and upland habitats in response to Comment AY-5.

**Table 2-4 Vegetation Communities and Land Covers Onsite**

Vegetation Community/Land Cover Type	Tier	Acreage		
		Outside MHPA	Inside MHPA	Total
<b>Wetland Habitats</b>				
Southern coastal salt marsh	NA	1.78	0.05	1.83
Southern coastal salt marsh disturbed	NA	<0.01	--	<0.01
Saltpan/Mudflats	NA	3.63	1.06	4.69
Open water	NA	21.05	0.89	21.94
Beach	NA	84.57	10.01	94.58
<b>Subtotal</b>		<b>111.03</b>	<b>12.01</b>	<b>123.04</b>
<b>Upland Habitats</b>				
Southern foredunes	I	5.5	0.0	5.5
Diegan coastal sage scrub	II	12.7	0.0	12.7
Disturbed Land	IV	298.1	43.3	341.4
Urban/Developed/Ornamental	IV	36.7	1.8	38.5
<b>Subtotal</b>		<b>353</b>	<b>45.1</b>	<b>398.1</b>
<b>Total</b>		<b>464.03</b>	<b>57.11</b>	<b>521.14 464.03</b>

Source: Alden 2017

Page 8-6, Chapter 8, *Effects Found Not to be Significant*. The second paragraph in the Tribal Cultural Resources section has been revised as follows:

Although much research has been conducted within and in proximity to both ethnohistoric villages, the project area is within a portion of Mission Bay Park that was dredged to create the landform now known as Fiesta Island using hydrologic fill from the old False Bay bottom. The project area in its current form consists of dredged fill and sand dunes which now support recreational land uses and Least Tern nesting sites. Based on a review of relevant source information obtained during records searches of the California Historical Resources Information System (CHRIS) and the Sacred Lands File maintained by the NAHC, Native American cultural resources that could be listed in or eligible for listing in the California Register of Historical Resources, or listed in a local register of historical resources were not identified within the project area, and no known human remains have been encountered within the project site. ~~Additionally, California Native American tribes culturally affiliated with the project area were notified of the proposed project in accordance with both SB 18 and AB 52 and, as of the date of this document, no formal requests for consultation have been received on this project.~~

Consultation in accordance with SB 18 and AB 52 was conducted with the Iipay Nation of Santa Ysabel and Jamul Indian Village of California attended the consultation for AB 52. The project scope was discussed, and no further consultation was required. The consultation resulted in the following policy recommendation to

### 3. Revisions to the Draft PEIR

include native plants for the dual purpose of restoration and cultural/historic educational engagement. “Plant native plants as part of habitat restoration or revegetation activities within disturbed areas. Consider using plants native to the area that would have been gathered historically by members of the local Kumeyaay village to promote opportunities for educational engagement and public participation in historic preservation and enjoyment of cultural resources.” The consultation has been completed and requirements for notification in accordance with CEQA have been satisfied. Please note, however, that pursuant to SB 18, a notice of the San Diego City Council hearing will be mailed/emailed to all tribal groups identified by the NAHC for this project.

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Page 9-13, Chapter 9, *Alternatives to the Proposed Project*. The first sentence in Section 9.9, Option A Vs. Option B, has been revised to remove “While Option A is the proposed project” in response to Comment AW-1.

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