

Errata to the Mission Bay Park Master Plan – Fiesta Island Amendment Final Program Environmental Impact Report

Project No. 562189
SCH No. 2017051034
May 3, 2019

The Mission Bay Master Plan – Fiesta Island Amendment Final Program Environmental Impact Report (Final PEIR) dated March 28, 2019, includes changes that were made to the document since the public review Draft PEIR dated December 7, 2018. These changes are shown in ~~strikeout~~/underline format in *Chapter 3, Revisions to the Draft PEIR*, within the Final PEIR. Subsequent to distribution of the Final PEIR, additional edits were made to correct factual inaccuracies or typographical errors, or to provide clarifying information in the Final PEIR that are described in this Errata, as indicated below in ~~strikeout~~/underline format. The complete Final PEIR is comprised of:

- The Draft PEIR dated December 7, 2018;
- The Final PEIR, dated March 28, 2019; and
- The Errata to the Final PEIR, dated May 3, 2019.

In accordance with California Environmental Quality Act (CEQA) Section 15088.5, the addition of new information that clarifies, amplifies, or makes insignificant modification does not require recirculation as there are no new impacts and no new mitigation identified. An environmental document need only be recirculated when there is identification of new significant environmental impacts or with the addition of a new mitigation measure required to avoid a significant environmental impact. These corrections do not result in any new physical effects and do not affect the conclusions of the environmental analysis contained within the Final PEIR. Therefore, in accordance with CEQA Section 15088.5, recirculation of the Final PEIR is not required.

Corrections:

1. The attached letter, Comments on the Notice of Preparation of a Programmatic Environmental Impact Report for the Mission Bay Park Master Plan Update – Fiesta Island

Amendment, from the U.S. Fish and Wildlife Service, received via email on June 19, 2017, is added to Appendix 1-2, Comments on the NOP.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008



In Reply Refer To:
FWS-SDG-17B0418-17TA0912

June 19, 2017
Sent by Email

Ms. Rebecca Malone
City of San Diego
Planning Department
1010 2nd Avenue, MS 413
San Diego, California 92101

Subject: Comments on the Notice of Preparation of a Programmatic Environmental Impact Report for the Mission Bay Park Master Plan Update – Fiesta Island Amendment.

Dear Ms. Malone:

The U.S Fish and Wildlife Service (Service) has reviewed the above-referenced Notice of Preparation (NOP) of a Programmatic Environmental Impact Report (PEIR) dated May 9, 2017. The Service appreciates the time extension until June 19, 2017, granted by the City of San Diego (City) for providing comments to the NOP. The comments and recommendations provided herein are based on the information provided in the NOP, *Mission Bay Master Plan Update* (Master Plan; City 2002), the *Mission Bay Park Natural Resource Management Plan* (Management Plan; City 1990), our knowledge of sensitive and declining vegetation communities in the region, and our participation in the Multiple Species Conservation Program (MSCP) and the City's MSCP Subarea Plan (SAP).

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCPs) developed under section 10(a)(1) of the Act. The City participates in the Service's HCP Program by implementing its SAP.

The 485-acre Fiesta Island is located within the City's Mission Bay Park and the City's MSCP. Fiesta Island includes the North Fiesta Island and Stony Point nesting sites for the federally endangered California least tern (*Sterna antillarum brownii*; least tern), which is a covered species in the City's SAP. As shown in the Management Plan, the nest sites are within the Multiple Habitat Planning Area (MHPA), or preserve established by the City's SAP. The City's SAP requires implementation of the Management Plan, including ongoing maintenance/management of these sites to continue to provide habitat for the least tern such as: (1) site preparation (vegetation and

substrate management), (2) minimization of human disturbances, (3) monitoring, and (4) predator management. In addition, the beaches, coastal areas, and offshore areas on or adjacent to Fiesta Island support forage/roosting habitat for least terns and other shorebirds.

The current Master Plan includes a Concept Plan for Fiesta Island with areas for recreational uses such as developed park, swimming areas, youth camping, primitive camping, Over the Line sand arena, concessions, special event RV parking, and launch areas for personal water craft. The Concept Plan also provides for environmental areas including upland and least tern preserves, salt pans, native landscaping, marsh land and additional eelgrass areas as wildlife habitat. For planning purposes, Fiesta Island has been subdivided into northern, central, southeastern and southwestern subareas.

The proposed project will revise the Concept Plan to include: an extension of the roadway along Hidden Anchorage “cove”, in the southwestern subarea; access for swimming in the channel area south of the island; developed parkland, playground and restrooms; roadway changes and paved parking areas at various locations along Fiesta Island Road that are intended to improve the quality of storm water runoff; the creation of trails to the interior of the island. For the southwestern subarea, the amendment to the Master Plan will revise the Concept plan to be one of two options:

Option A proposes to extend Fiesta Island Road to an area south of Hidden Anchorage to access a parking area, picnic tables, paddling facility/storage, pier, ramp and floating dock, a designated swimming beach area, and developed park with a children’s play area and restroom, while providing for habitat areas (least tern and eel grass). This option will also include a dog special event area with an obstacle course, a dog competition area, and restrooms, for a total of approximately 87 acres of dog off-leash use within this southwest area.

Option B includes a parking area that will not extend as far, and will provide for a view pavilion and view plaza; picnic tables; running trail; maintenance/emergency trail; native, least tern and eel grass habitat areas; and dog off-leash non-native vegetation play areas, for a total of approximately 93 acres of dog off-leash use within this southwest area.

All other recreation and design aspects of the island would be identical between the two options.

The Service recommends that the revised Concept Plan include a reconfiguration of the North Fiesta Island least tern nest site so that it is adjacent to bay water. Currently, this least tern nest site is surrounded by uplands supporting nest predators (e.g., snakes and rats) and is separated from the bay water by a road. Least tern nest sites immediately adjacent to water are more successful because least terns feed on fish and intertidal habitat provides nursery habitat for fish eaten by least terns. Therefore, we recommend that road be removed from the northern subarea, or rerouted around the nest site, and that intertidal habitats (e.g., mudflat, coastal salt marsh) be restored between the nest site and bay water. We also recommend that an additional least tern nest site be established along the western shore of the island opposite of FAA Island. This site could be used to replace the Cloverleaf nest site as discussed in the Management Plan (page 32).

In addition, we recommend that the revised Concept Plan maximize wetland/upland buffer restoration at Fiesta Island. The Master Plan identifies the central and northern subareas for Habitat-oriented Recreation/Preservation, which is characterized as “wetland and upland habitat serving more passive activities, including trails for hiking and jogging, or wetland areas for rowing and canoeing” (City 2002, p 33). To accomplish this, the Concept Alternatives should include wetland/upland buffer restoration throughout the central and northern subareas consistent with the Master Plan. This will also support the City’s goal of “a balanced provision of public recreation, the sustainable management of environmental resources, and the operation of economically successful commercial leisure enterprises” (City 2002, p 2). Additionally, wetland/upland buffer restoration in the central and northern subareas would synergize with wetland restoration in northeast Mission Bay (i.e., ReWild Mission Bay) thereby providing more contiguous wetlands to improve water quality and habitat for wildlife.

We offer our additional comments and recommendations in the appendix to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources and to ensure that the project is consistent with the City’s SAP. We request a meeting with the City to discuss our comments and recommendations.

We appreciate the opportunity to comment on the NOP. If you have questions or comments regarding this letter, please contact Patrick Gower at 760-431-9440.

Sincerely,

for Karen A. Goebel
Assistant Field Supervisor

Appendix

LITERATURE CITED

[City] City of San Diego. 1990. Mission Bay Park Natural Resource Management Plan. City of San Diego park and Recreation Department. 69 pp.

[City] City of San Diego. 2002. Mission Bay Park Master Plan Update. Adopted August 2, 1994. Amended July 9, 2002. 370 pp.

Appendix

U.S. Fish and Wildlife Service Comments and Recommendations on the Notice of Preparation of a Programmatic Environmental Impact Report For the Mission Bay Park Master Plan Update – Fiesta Island Amendment

To enable us to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the Programmatic Environmental Impact Report (PEIR):

Specific Comments

1. An alternative can also include expanding and restoring wetland habitat in the North Island, and fully separating the North Island from the Central Island by creating a channel.
2. To inform plans for Fiesta Island and elsewhere in Mission Bay, we recommend that the City conduct and include within the PEIR a vulnerability assessment to analyze the impacts of future sea level rise on the natural resources in Mission Bay.
3. The seasonal buffer area included adjacent to Stony Point appears smaller than the buffer that is present under baseline conditions. The seasonal buffer is necessary to reduce potential impacts to the least tern. We recommend that the current seasonal buffer be retained, or that the City consult further with the Service to determine a seasonal buffer configuration that will adequately protect the least tern from disturbance.
4. We recommend that the City minimize facility and infrastructure development on Fiesta Island, to allow for potential future wetland creation. Of the two options, Option B appears to be the environmentally superior alternative since this option calls for less infrastructure on Fiesta Island.

General Comments

1. A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.
2. A complete list and assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying State or federally listed rare, threatened, endangered, or proposed candidate species; California Species-of-Special Concern and/or State Protected or Fully Protected species; and any locally unique species and sensitive habitats. Specifically, the DEIR should include:
 - a. A thorough assessment of Rare Natural Communities on site and within the area of impact. We recommend following the California Department of Fish and Wildlife's Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities.

- b. A current inventory of the biological resources associated with each habitat type on site and within the area of impact.
 - c. An inventory of rare, threatened, and endangered species on site and within the area of impact.
 - d. Discussions regarding seasonal variations in use by sensitive species of the project site as well as the area of impact on those species, using acceptable species-specific survey procedures as determined through consultation with the Wildlife Agencies. Focused species-specific surveys, conducted in conformance with established protocols at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required.
- 3. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources. All facets of the project should be included in this assessment. Specifically, the DPEIR should provide:
 - a. Specific acreage and descriptions of the types of wetlands, coastal sage scrub, and other sensitive habitats that will or may be affected by the proposed project or project alternatives. Maps and tables should be used to summarize such information.
 - b. Discussions regarding the regional setting, pursuant to the CEQA Guidelines, Section 15125(a), with special emphasis on resources that are rare or unique to the region that would be affected by the project. This discussion is critical to an assessment of environmental impacts.
 - c. Detailed discussions, including both qualitative and quantitative analyses, of the potentially affected listed and sensitive species (fish, wildlife, plants), and their habitats on the proposed project site, area of impact, and alternative sites, including information pertaining to their local status and distribution. The anticipated or real impacts of the project on these species and habitats should be fully addressed.
 - d. Discussions regarding (1) indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed NCCP reserve lands; (2) impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated and provided; and (3) potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address: project-related changes on drainage patterns on, and downstream of, the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.

- e. Discussions regarding possible conflicts resulting from wildlife-human interactions at the interface between the development project and natural habitats. The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions.
 - f. An analysis of cumulative effects, as described under CEQA Guidelines, Section 15130. General and specific plans, and past, present, and anticipated future projects, should be analyzed concerning their impacts on similar plant communities and wildlife habitats.
 - g. An analysis of the effect that the project may have on implementation of regional and/or subregional conservation programs. We recommend that the Lead Agency ensure that the development of this and other proposed projects do not interfere with the goals and objectives of established or planned long-term preserves and that projects conform with other requirements of the NCCP program.
4. Mitigation measures for unavoidable adverse project-related impacts on sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance, and where avoidance is infeasible, reduction of project impacts. For unavoidable impacts, off-site mitigation through acquisition and preservation in perpetuity of the affected habitats should be addressed. We generally do not support the use of relocation, salvage, and/or transplantation as mitigation for impacts on rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.