February 10th, 2022

PROJECT NAME: De Anza Natural (Amendment to the Mission Bay Park Master Plan)
SCH No.: 2018061024
LOCATION: Mission Bay Park – De Anza Cove
COMMUNITY PLANNING AREA: Mission Bay Park
COUNCIL DISTRICT: 2

The San Diego Audubon Society is a 3,000+ member non-profit organization with a mission to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and to advocate for a cleaner, healthier environment. We have been involved in conserving, restoring, managing, and advocating for wildlife and their habitat in the San Diego region since 1948. In 2014, we received funding from the USFWS and the State Coastal Conservancy to begin the planning and community discussions leading to the 2018 ReWild Mission Bay Feasibility Study. We are advocating for the Wildest wetland restoration alternative from that study. We lead the ReWild Coalition of 66 member organizations pushing this plan for our public park because of its habitat restoration acreage, water quality improvement, sea level rise resilience, and reconnection opportunities for humans. We have invested in the Park by supporting research into carbon sequestration and the economic costs of sea level rise, connecting with schools and inspiring students, surveying endangered species, and celebrating the marsh through community events.

The City's De Anza Natural NOP is a great step forward from the current land uses and from the 2018 plan, but there is significant progress still to be made. We applaud the City's increased focus on wetland restoration, acknowledgement of the need to empower Kumeyaay voices in the planning process, and the action the City is taking on climate resilience throughout the City. We see the De Anza Natural plan as a first example of how the city should prioritize restored habitats and resilient infrastructure, and we submit these comments as improvements to move San Diego forward.

Improved water quality

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

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

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

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

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

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

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

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

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

Sea level rise resilience

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

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

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

The EIR should analyze these critical components.

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

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

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

Access for all San Diegans including Native American communities

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

The De Anza Natural NOP states: "De Anza Natural will also recognize the history and ancestral homelands of the Iipay-Tipay Kumeyaay people, providing opportunities to partner and

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

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

1. The City plans for recreation at the Bay-wide scale, and this EIR needs to analyze the changes in beach and boat access compared to those opportunities in the entire Bay, and compare the addition of accessible nature-based tidal-wetland and cultural center access compared to those opportunities in the rest of the Bay.
2. The EIR should analyze moving the interpretive center to the east side of Rose Creek and should include a cultural and educational focus. There are over 25 schools within 5 miles of this corner of Mission Bay—this area needs to be an educational and cultural showcase for environmental literacy in our students. An east-of-Rose Creek education center would be farther from the new UCSD Natural Reserve System Kendall-Frost Marsh community center, and the vehicle circulation needed to get buses and groups to the center is better served by the infrastructure planned on the east side. Partnerships with academic institutions, tribal organizations and governments, and groups specializing in education and outreach should be brought into the planning process for this center. The Mission Bay Park Master Plan called for a nature center in Mission Bay over 25 years ago.
3. Low-Cost Visitor Accommodation needs to specifically allow group and tent camping because of its much lower impact to surrounding land uses, and the lease should not "include open beach" as the beach must remain a public, shared shoreline. The EIR should not allow boat or vehicle storage here as that is not coastal-dependent and would limit the acreage for other uses.
4. The EIR should encompass a Traditional Cultural Properties review and identify Tribal Cultural Resources, including open water, plants and the cultural landscapes and resources in the area. The EIR should also include an ecotourism plan that includes local businesses and expertise, analyzing how the community benefits from the plan and de-emphasizing the need to generate funds from our regional park.

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5. The EIR also needs to define low-cost visitor accommodation. The ReWild Coalition wants equitable access opportunities and programs with low-cost guest accommodation accessible to all San Diegans, including disadvantaged communities and Native American groups. The EIR needs to show an analysis of how they will reach their target demographic of low-cost visitors.
6. The City of San Diego needs to develop a comprehensive permitting process to support nonprofit outdoor recreation and education programs that promote equitable and environmentally responsible coastal access to Mission Bay for youth and families who face significant barriers, including those from Native communities. Currently, no such permitting process exists.
7. The low-cost visitor accommodation should have an education focus, to improve the management of the area and better set expectations for acceptable disturbance levels from this land use.
8. The EIR must show the boundary of Public Trust Tidelands, and show how the new plan meets the City's obligations to manage these areas. The City was recently warned by the State Lands Commission (Campland on the Bay and Mission Bay RV Resorts Violations, 10/27/21) after the Coastal Commission penalized these two leasees for more than $1million. The letter states the need to oversee leases in this area more effectively to ensure that the public has access.
9. The EIR should analyze the opportunities in the plan to rename the significant features of the park. The City's new Parks Master Plan specifically prioritizes "using the Kumeyaay language and culturally appropriate images or symbols when naming and renaming" parks (Arts and Culture policy 7, pg 98).

Habitat Restoration

- **Replace the spit of land west of Rose Creek with a low island farther south in the bay for high tide use by birds and protection of the marsh.**
- **Increase the amount of transition zone habitat for Belding's Savannah Sparrow and other species.**
- **The EIR must show the topography of the restored marsh, with mudflat, low marsh, high marsh, transition and upland habitats shown at the start of the project and in 2050, 2075 and 2100.**
- **Uplands and Buffers land use should be planted with only native species, should focus on education and passive enjoyment, and not include roads for motorized vehicles or parking.**

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

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

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

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

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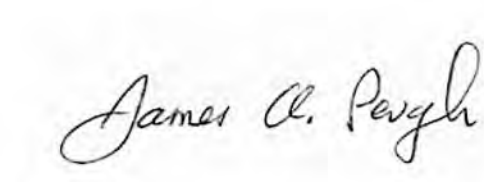
Sincerely,



James A. Peugh
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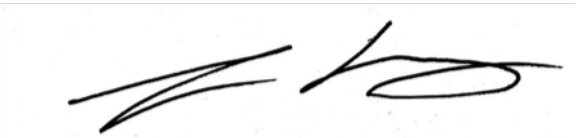

Travis Kemnitz
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