April 20th, 2023

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

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

Dear Planning Committee Staff,

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

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

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

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

De Anza Natural draft PEIR

Executive Summary

S.1.1 Project Location and Setting

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

S.1.2 Project Description

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

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

   b. The State Coastal Conservancy's Explore the Coast program specifically calls out the need to diversify our coastal accommodations away from recreational vehicles (Explore the Coast Overnight, an Assessment of Lower Cost Guest Accommodations, 2019) and the draft PEIR should not be specific at this stage of planning on what kind of low-cost guest accommodation will be created. Please provide this clarification.

2. The Project Description states that what we now call Mission Bay is the ancestral lands of the Iipay-Tipay Kumeyaay people, but provides no recognition of their previous stewardship and no specificity about engaging this critical community. Please conduct research and provide this additional information.

S.2. Project Objectives

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

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

a. The Mission Bay Park Master Plan is clear that "[f]oremost in consideration should be the extent to which the Special Study Area can contribute to the Park's water quality. In fact, additional wetlands creation must be considered as part of the SSA" (MBPMP p53).
b. The City of San Diego Notice of Preparation for this draft PEIR also identifies water quality improvement as one of the six listed Project Components.
c. In April 2023, the Blue Water Task Force records the Campland sampling location water failing to meet water quality standards 41% of the time for the preceding 12 months. The impact of water quality improvement, and water quality improvement comparison between alternatives is a deficiency of the draft PEIR and must be corrected.
d. The ESA Technical Memorandum (attached to this comment letter in its entirety) cautions that *"the PEIR does not include a discussion of the potential impacts to water quality associated with the creation of a channel that connects Rose Creek to De Anza Cove."*
e. The Mission Bay Park Master Plan includes Appendix B-2 Hydrology – Use of Created Wetlands for Stormwater Treatment in Mission Bay by San Diego State University researcher Dr. Richard Gersberg. This Appendix, from 29 years ago, emphasizes the importance and understanding of water quality improvement from restored wetlands—with particular emphasis on the improvement of bay-wide water quality from wetlands in the study area. This Appendix must be included in the draft PEIR and used to analyze how the projects help to meet the new Project Objective for water quality improvement, as stated below.

4. Project Objective 2 is important but the City has not reached out to Kumeyaay and other Indigenous partners to begin this conversation early enough. Writing this PEIR without substantial Tribal input is a colonial point of view on the management of shared natural resources and the City process for partnering with Tribal nations must be improved.

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

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

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

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

S.7 Environmentally Superior Alternative.

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

Chapter 2: Environmental Setting

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

2.3.3.2 Biological Resources

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

restored separately from wetland habitats. Section 113.0103 of the San Diego Municipal Code defines wetlands and eelgrass beds don't meet these criteria:
"Wetlands are defined as areas which are characterized by any of the following conditions:

1. All areas persistently or periodically containing naturally occurring wetland vegetation communities characteristically dominated by hydrophytic vegetation, including but not limited to salt marsh, brackish marsh, freshwater marsh, riparian forest, oak riparian forest, riparian woodlands, riparian scrub, and vernal pools;
2. Areas that have hydric soils or wetland hydrology and lack naturally occurring wetland vegetation communities because human activities have removed the historic wetland vegetation or catastrophic or recurring natural events or processes have acted to preclude the establishment of wetland vegetation as in the case of salt pannes and mudflats;
3. Areas lacking wetland vegetation communities, hydric soils and wetland hydrology due to non-permitted filling of previously existing wetlands;
4. Areas mapped as wetlands on Map No. C-713 as shown in Chapter 13, Article 2, Division 6 (Sensitive Coastal Overlay Zone)."

2. This section must include a description of the state-wide, region-wide, and bay-wide loss of tidal wetland habitats to accurately reflect the importance of these biological resources. The Southern California Wetlands Recovery Project Regional Strategy (2018) shows that 62% of Southern California's tidal wetlands have been lost, and in Mission Bay, the percentage is even higher at over 95% of the historic tidal marsh, mudflats and shallow open water have been converted to deeper open water and upland land uses. Most natural habitats in the bay were destroyed by large-scale dredging by the City of San Diego in the post-World War II years with dredge spoils from this process used to create the islands seen today.

3. G. Wildlife Corridors and Habitats: The draft PEIR should discuss the existence of Mission Bay Regional Park along the Pacific Flyway and the establishment of the Park as an Important Bird Area (2014). From the Important Bird Area document: Mission Bay, including the Northern and Southern Wildlife Preserves and the Famosa Slough, was designated as an Important Bird Area of "Global Significance" by the National Audubon Society because the local area supports >1% of the global population of an endangered species, California Least Tern, nine sensitive species (brant, western snowy plover, light-footed clapper rail, long-billed curlew, California least tern, loggerhead shrike, Clark's marsh wren, Belding's savannah sparrow, large-billed savannah sparrow), and sensitive habitat (salt marsh, eel grass, alkali flats, and exposed shoreline). Now that light-footed clapper rail has

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

Chapter 4 Regulatory Framework

4.1.3 Local a. City of San Diego General Plan

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

Chapter 5: Environmental Analysis

5.1 Land Use

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

d. City of San Diego State Lands Sea Level Rise Vulnerability Assessment, and
e. City of San Diego Parks Master Plan.

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

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

5.1.3e Climate Action Plan

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

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

5.3 Biological Resources

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

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

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

5.6 Historical, Archeological, and Tribal Cultural Resources

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

Chapter 8: Alternatives

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

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

n. CSR 27: Maximize opportunities to restore native habitat and enhance biodiversity in parks and open space lands.
o. CSR 30: Promote the awareness and value of wetlands, waterways, and restored landscapes in developed parks as well as open spaces.
p. PP14: Providing reduced cost or no cost permits to non-profit organizations for programming and events within parks and recreation centers which benefit disadvantaged communities.

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

8.2.1.2 Rationale for Elimination

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

iv. The draft PEIR states that all the ReWild Alternatives "reduce access to the Cove's shorelines," but as stated previously the Project Objectives should not be specific to the Cove as there are numerous other pieces to the study area and the existing sandy shoreline is over-represented in the Park as a whole, and accessible tidal ecosystems are drastically under-represented.

v. When the draft PEIR is improved to include consistency review with the Parks Master Plan, multiple policies in that City document support the equitable access improvements that can come from restored habitats, and help bolster the value of access to restored natural places for all San Diegans, including underserved and Indigenous communities.

vi. ESA's Technical Memorandum finds that "*[b]y creating more wetlands, both the Wetlands Optimized Alternative and the "Wildest" Alternative provide greater opportunity for all communities to access this unique habitat and enhance public access in Mission Bay."* Also finding that *"the project should be considered in the context of Mission Bay as a whole. Mission Bay Park has extensive beach areas for public access; therefore creation of more wetlands rather than public beach areas should be considered a benefit, not a negative. The City should consider adjusting the Wetlands Optimized alternative to increase the low-cost visitor guest accommodations and remove all or portions of the golf course, which is not a coastal dependent use while prioritizing wetlands in order to meet project objectives 1 and 6."*

b. Project Objective 2: The draft PEIR's conclusion that Wildest does not meet this Objective is incorrect. Kumeyaay communities cannot reconnect to De Anza Cove, because De Anza Cove was artificially made in the last 75 years. For millennia, local tribal nations engaged with the salt marshes that once existed throughout much of Mission Bay. The salt marsh plants, birds, wildlife, and fish are what constitutes reconnection, not access to a European-American redesign of the natural environment. The ReWild Coalition's members and discussions with Tribal partners have shown that local Tribal nations want space to reconnect to the tidal habitats for harvesting.

i. When the draft PEIR is improved to include consistency review with the Parks Master Plan, multiple policies in that City document support the equitable access improvements that can come from restored habitats, and help bolster the value of access to restored natural places for all San Diegans, including underserved and Indigenous communities.

ii. The reason for the Wetland Optimized Alternative satisfying this Objective but not the Wildest alternative is unclear.

iii. The ESA Technical Memorandum shows that *"[i]n Section 8.3.2.3, the PEIR states that "The Wetlands Optimized Alternative would meet project objective 2 by fostering opportunities for members of local Tribal nations to reconnect to De Anza Cove." However, in Section 8.2.1.2, the PEIR states that the ReWild alternatives "would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove," but with no explanation of how this conclusion was reached. At the program level, there is still an opportunity to work with tribes to adjust any of the project alternatives to provide opportunities for tribal reconnection. At this point, there is no justification for eliminating the ReWild alternatives based on objective 2."*

c. Project Objective 3: The Wildest and Wetlands Optimized alternatives meets this project objective better than the preferred alternative.
    i. ReWild Wildest best meets the acreage goal set in Strategy 5 of the City's Climate Action Plan of 700 acres of restored wetland by 2035. No other alternative restores this much diverse wetland habitat and shows how it persists through sea level rise for the rest of the century.
    ii. When the draft PEIR is improved to include the acreage goals in the City's Climate Action Plan, this will be supported by the draft PEIR.
d. Project Objective 4: The Wildest and Wetlands Optimized alternatives meets this project objective better than the preferred alternative by creating the largest and most contiguous restored wetlands.
    i. ReWild Wildest meets this goal best because, as described in the review of the Mission Bay Park Natural Resources Management Plan (draft PEIR page 377), the Mission Bay Park Master Plan EIR specifically calls out the benefits of "large contiguous" habitat areas for wetland restoration, and the Wildest plan proposed the largest and most contiguous restored wetland.
    ii. Of particular concern with the preferred project is the size of the proposed (low-cost accommodations) development on the "boot" area south of the identified new channel. That would reduce the potential to meet the expanded saltmarsh/wetlands commitments and would introduce many impacts (noise, lighting, general human activities) to the adjacent wetlands. The draft PEIR should include an analysis of the potential negative impacts to wetlands adjacent to low-cost accommodations.
e. Project Objective 5: The daft PEIR claims that ReWild Wildest fail to meet Project Objective 5, but that is incorrect for several reasons. The draft PEIR is deficient because it ignores the recreational and cultural value of an accessible tidal marsh ecosystem, instead only valuing the impact of lost recreation from the

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

   a. More tidal wetland acreage results in more active recreation (culturally-informed harvesting, fishing, biking), passive recreation (birding, walking, wheelchairing, kayaking, paddleboarding) and educational opportunities.
   b. These recreational uses are not currently available in Mission Bay Regional Park at all. The addition of these activities to the Bay would greatly balance the recreational opportunities at the Bay-wide scale.
   c. The Coastal Act recognizes the aesthetic value of natural habitats, stating "the scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance."
   d. Restored and accessible tidal wetland habitats in the study area would be one of the most accessible of its type in San Diego, with the new public transit stops at the Balboa Ave. transit station helping people get to this regional asset, specifically helpful for underserved communities.

3. Wetlands Optimized Alternative. The draft PEIR states this alternative would be consistent with the SANDAG Regional Plan, enhance access and safety getting to the site and encourage multimodal transportation options, both locally and outside the local area. However, the analysis later identifies that this alternative would have lower or similar GHG emissions while causing higher VMT (because of a reduction in low-cost accommodations and other recreational activities that would then force potential visitors to use other facilities outside the project area). It is unclear how much re-directed travel would occur and, if much of that driving originated outside the local area, whether it would even be significant. Please provide substantial evidence such as the number of users of these facilities by zipcode to support this conclusion, or change the conclusion, if appropriate.
4. Neither the Enhanced Wetlands/Optimized Parkland Alternative nor Resiliency Optimized Alternative appear to meet the (current) project objectives. It is unclear how the draft PEIR can conclude that the Environmentally Superior Alternative is the No Project when, as described above, it has many potentially greater impacts than the proposed project and, from our review and assessment, than the Wetlands Optimized Alternative. The draft PEIR does not adequately justify that conclusion.

Mission Bay Park Master Plan Amendment comments:

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

Conclusion

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

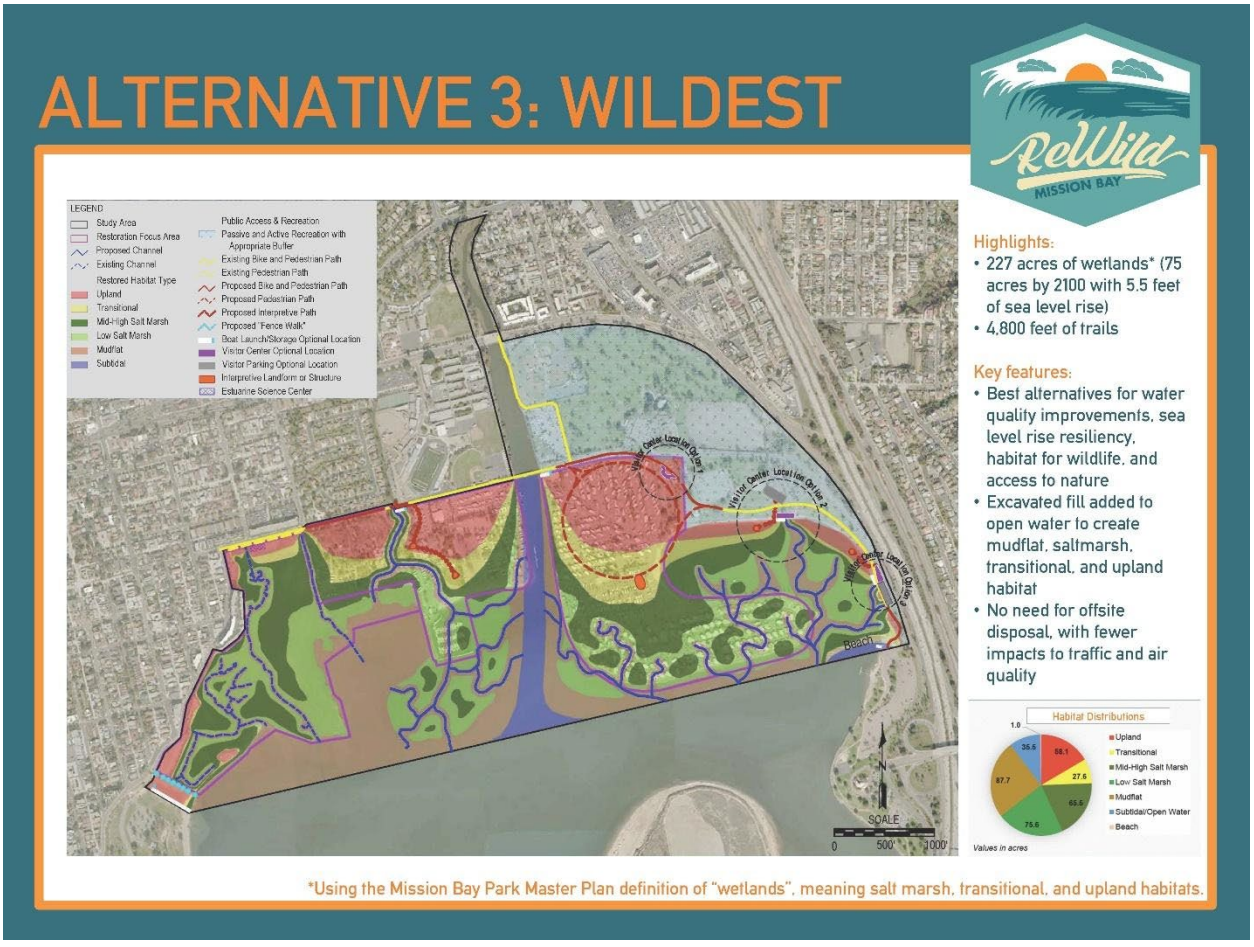
A new Project Objective needs to be added to prioritize water quality improvement in the plan. Sea level rise modeling that shows 80 acres of additional restored tidal wetland habitat is needed at this stage of planning. The City's Climate Action Plan Strategy 5 wetland restoration goals must be used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

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

Sincerely,
The ReWild Mission Bay Coalition Members:

American Academy of Pediatrics: San Diego and Imperial Counties
AFT Guild, Local 1931
American Bird Conservancy
Aqua Adventures
Audubon California
Beautiful P.B.
Bike SD
Buena Vista Audubon Society
California Native Plant Society
Casa Tamarindo
Center for Local Government Accountability
Citizens Coordinate for Century 3
Clean Earth for Kids
Climate Action Campaign
The Climate Reality Project San Diego
Coastal Policy Solutions
Coffee Cycle
Community Congregational Church of Pacific Beach
Corona Enterprises
Earth Discovery Institute
Endangered Habitats League
Environmental Center of San Diego
Environmental Health Coalition
Epsilon Eta
Friends of Famosa Slough
Friends of Mission Bay Marshes
Friends of Rose Canyon
Friends of Rose Creek
Groundwork San Diego
Islamic Center of San Diego
Kai Pono Solutions
Latino Outdoors
Law Office of Michelle A. Gastil
League of Women Voters of San Diego
McCullough
Mission Bay Fly Fishing Co.
Montgomery-Gibbs Environmental Coalition
Native Like Water
Nature Collective
Ocean Connectors
The Ocean Foundation
Outdoor Outreach
Paradise Gardeners
Pacific Beach Democratic Club
Pacific Beach Rotaract
Renascence
Rose Creek Watershed Alliance
St. Andrew's by-the-Sea Episcopal Church
San Diego 350
San Diego Audubon Society
San Diego Canyonlands
San Diego City College Audubon Club
San Diego City College SACNAS Chapter
San Diego Coastkeeper
San Diego County Democrats for Environmental Action
San Diego Democrats for Equality
San Diego EarthWorks
Fiesta Island Dog Owners
San Diego Green New Deal Alliance
San Diego Pediatricians for Clean Air
San Dieguito River Valley Conservancy
SD Children and Nature
Save Everyone's Access
Sierra Club San Diego
Southwest Wetlands Interpretive Association

Stay Cool for Grandkids
St. Dunstan's Episcopal Church
Strong Hearted Native Women's Coalition
Surfrider San Diego
Sustainability Matters
Unite Here! Local 30
Urban Corps
Waste for Life
The White Sands Green Committee
Wildcoast



ReWild Mission Bay Wildest Alternative

ESA

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memorandum

date	April 18, 2023
to	Andrew Meyer, San Diego Audubon Society
cc	
from	Annie Roberts, Lizzie Schalo PE and Lindsey Sheehan PE, Environmental Science Associates
subject	Technical Review Memorandum for the De Anza Natural Amendment to the Mission Bay Park Master Plan Draft Program Environmental Impact Report, Sch #2018061024

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

1. Land Use Considerations

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

1.1 Project Relation to Entire Mission Bay Park

1.1.1 Wetland Habitat

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

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

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

1.1.2 Active Recreation

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

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

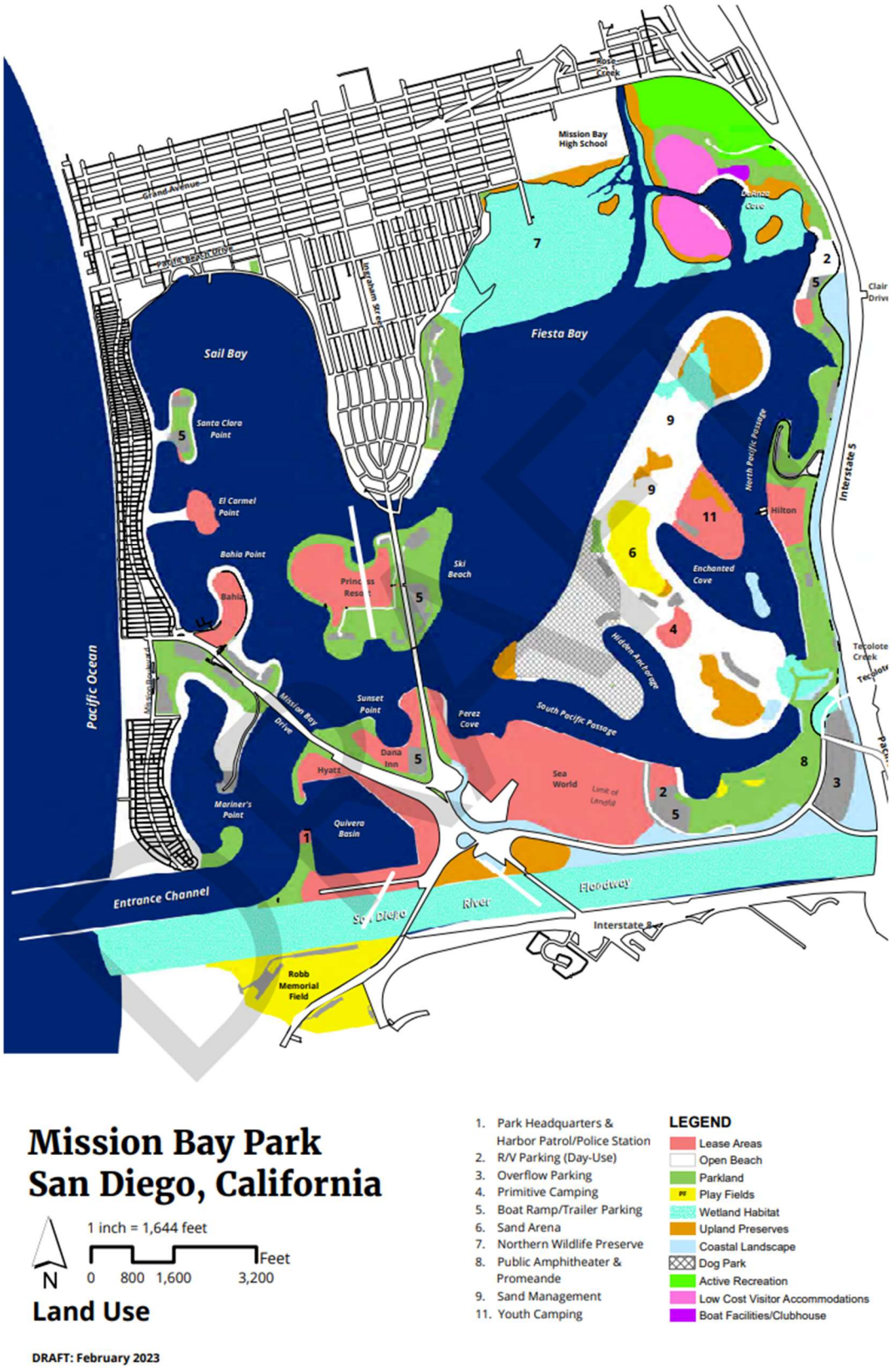

Figure 1. Draft Land Use map from the 2023 Mission Bay Park Master Plan Amendment

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

1.2 Wetlands Provide Recreation Opportunities

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

2. Sea Level Rise and Climate Change Considerations

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

2.1 Sea Level Rise Resiliency

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

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

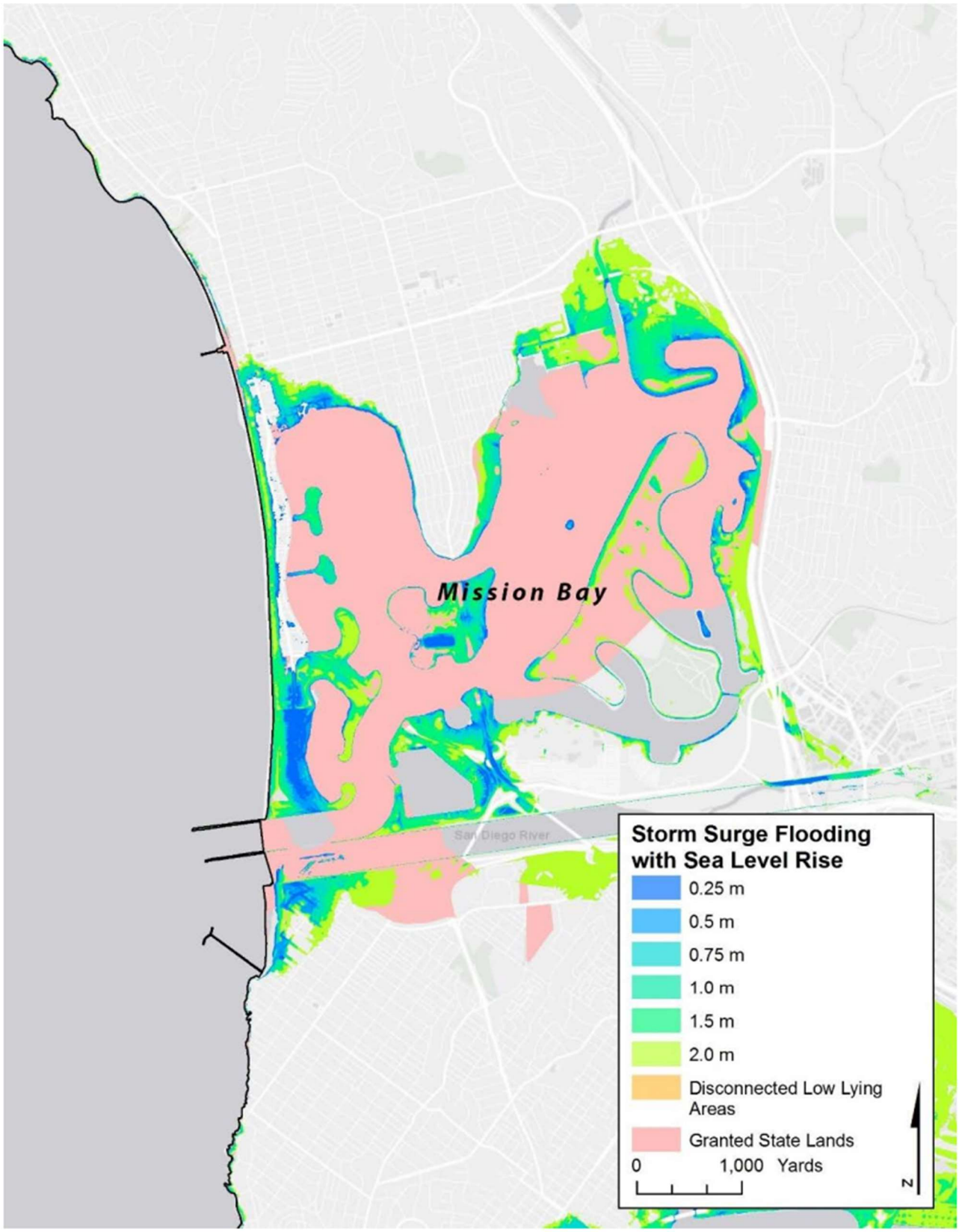

Figure 3. Mission Bay exposure to storm surge and sea level rise.

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

2.2 SEP Habitat Requirements

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

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

2.3 Cut/fill Balance

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

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

2.4 Greenhouse Gases and Carbon Sequestration

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

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

3. Public Access

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

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

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

4. Impacts to Water Quality

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

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

5. Impacts to Eelgrass

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

6. Tribal Nation Reconnection Opportunities

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

7. Conclusions

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

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

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

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

Objective	Proposed Project	Wetlands Optimized Alternative	ReWild "Wildest" Alternative
1. Provide equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access.	• 48.5 ac low-cost visitor guest accommodations	• 27.4 ac of low-cost visitor guest accommodations, which could be expanded to match the proposed project by changing/removing the golf course • Would increase access to wetlands which are currently restricted	• Developed areas were not detailed out in the Feasibility Study, but left space that can be used to match the area of the low-cost visitor guest accommodations in the proposed project • Would increase access to wetlands which are currently restricted
2. Foster opportunities for members of local Tribal nations to reconnect to De Anza Cove.	The PEIR includes no description of how any alternative would or would not meet this objective. At the program level, there is still an opportunity to work with tribes to adjust any of the project alternatives to provide opportunities for tribal reconnection.		
3. Incorporate climate adaptation strategies to increase resilience to climate change and mitigate potential sea level rise impacts.	• 37.4 ac upland habitat and buffer areas for sea level rise transition habitat • 140.5 ac of marsh to provide carbon sequestration benefit	• 46.1 ac upland habitat and buffer areas for sea level rise transition habitat • 250.9 ac of marsh to provide carbon sequestration benefit	• 85.7 ac upland habitat and buffer areas for sea level rise transition habitat • 227 ac of marsh to provide carbon sequestration benefit • Cut/fill fully analyzed and balanced on site, so no soil transportation emissions
4. Embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats within De Anza Cove.	• 140.5 ac marsh	• 250.9 ac marsh • Allows more access to marsh to encourage public stewardship through exposure	• 227 ac marsh • Allows more access to marsh to encourage public stewardship through exposure
5. Diversify active and passive recreational uses that will serve a range of interests, ages, activity levels, incomes, and cultures both on land and in water.	Maximizing the restored habitat within the project area would provide significant recreational opportunities, including kayaking and walking paths to observe wildlife, that are coastal-dependent uses currently lacking in Mission Bay Park. Most of the perimeter of Mission Bay is designated as parkland, active recreation, open beach or play fields, while a minority is designated as wetland habitat.		
6. Enhance public access and connectivity within De Anza Cove and increase connections to the surrounding communities, including opportunities for multimodal travel.	• Would provide open beach area, which is plentiful in Mission Bay • Would provide tennis center, athletic fields, and a golf course which are not coastal-dependent uses	• Would increase access to wetlands which are currently restricted	• Would increase access to wetlands which are currently restricted • Includes walkways by the shoreline of the wetland, blinds to enhance opportunities to observe wildlife, some boardwalks through the wetlands, and a kayak trail for access at higher tides
Recommended additional objective: **7. Contribute to the improvement of the Park's water quality.**	• 140.5 ac of marsh to provide water quality benefits • Redirecting Rose Creek to De Anza Cove may impact water quality in the cove	• 250.9 ac of marsh to provide water quality benefits • Redirecting Rose Creek to De Anza Cove may impact water quality in the cove	• 227 ac of marsh to provide water quality benefits • Sea level rise modeling shows that tidal marsh acreage persists through 2100, and that wetland benefits to water quality will continue through the century

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Attachment A. Sea Level Rise Technical Assessment

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

Sea Level Rise Projections and State Guidance

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

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

- The low risk aversion scenario is appropriate for adaptive, lower consequence decisions (e.g., unpaved coastal trail), but is not adequate to address high impact, low probability events.

- The medium-high risk aversion scenario is appropriate as a precautionary projection that can be used for less adaptive, more vulnerable projects or populations that will experience medium to high consequences as a result of underestimating sea level rise (e.g., coastal housing development).

- The extreme risk aversion scenario is appropriate for high consequence projects with little to no adaptive capacity and which could have considerable public health, public safety, or environmental impacts (e.g., coastal power plant, wastewater treatment plant, etc.).

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

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

Wetlands Optimized Alternative Analysis

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

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

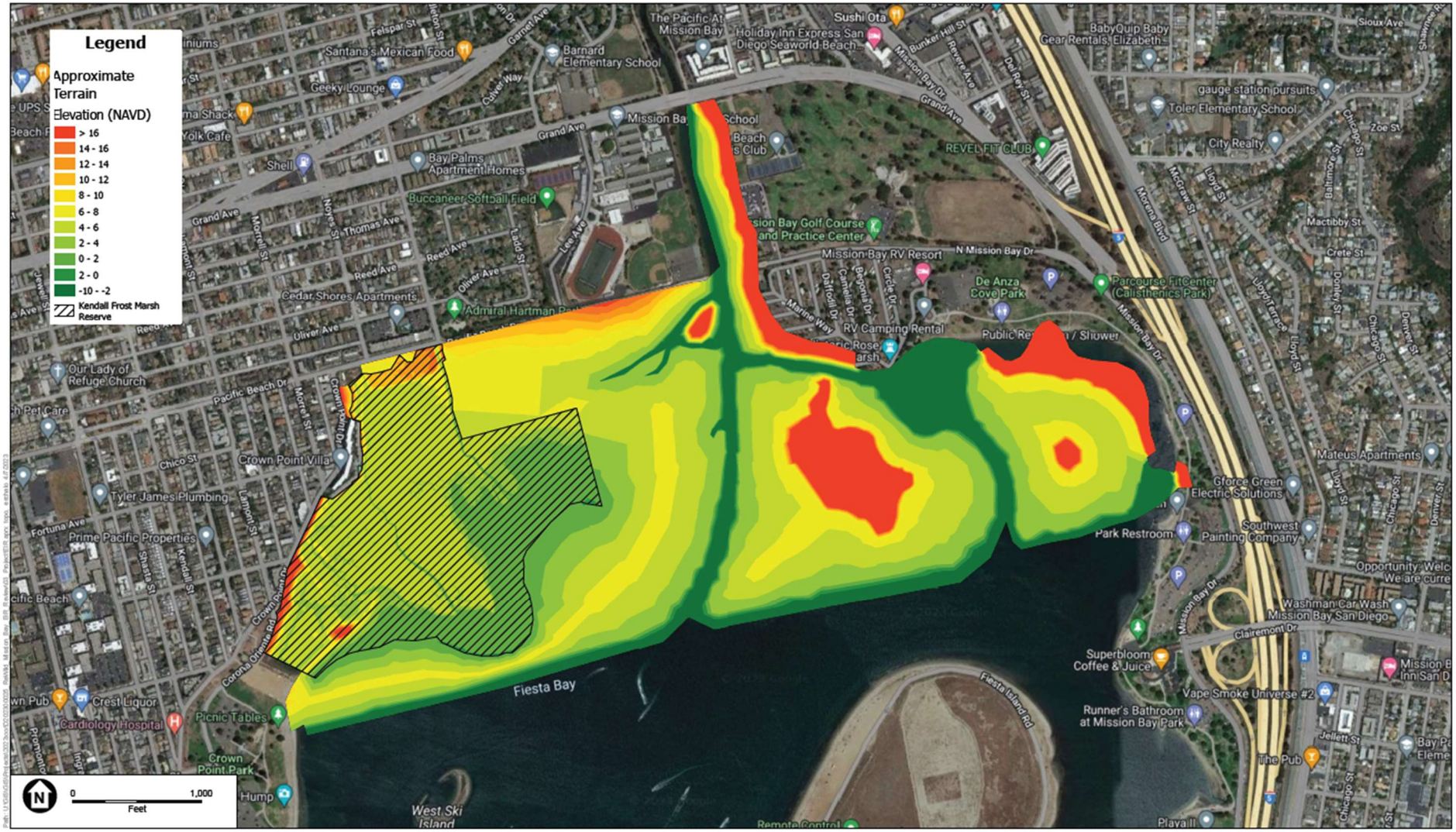
Marsh habitat acreages for 2100 were estimated for the Wetlands Optimized Alternative using the wetlands and uplands areas in PEIR Figure 8-1. ESA developed an approximate terrain by assuming an elevation of 2.9 ft NAVD (lowest saltmarsh elevation discussed above) at the edge of the proposed wetland,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

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

TABLE 2

HABITAT ACREAGES WITH SEA-LEVEL RISE

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



SOURCE: ESA, 2023

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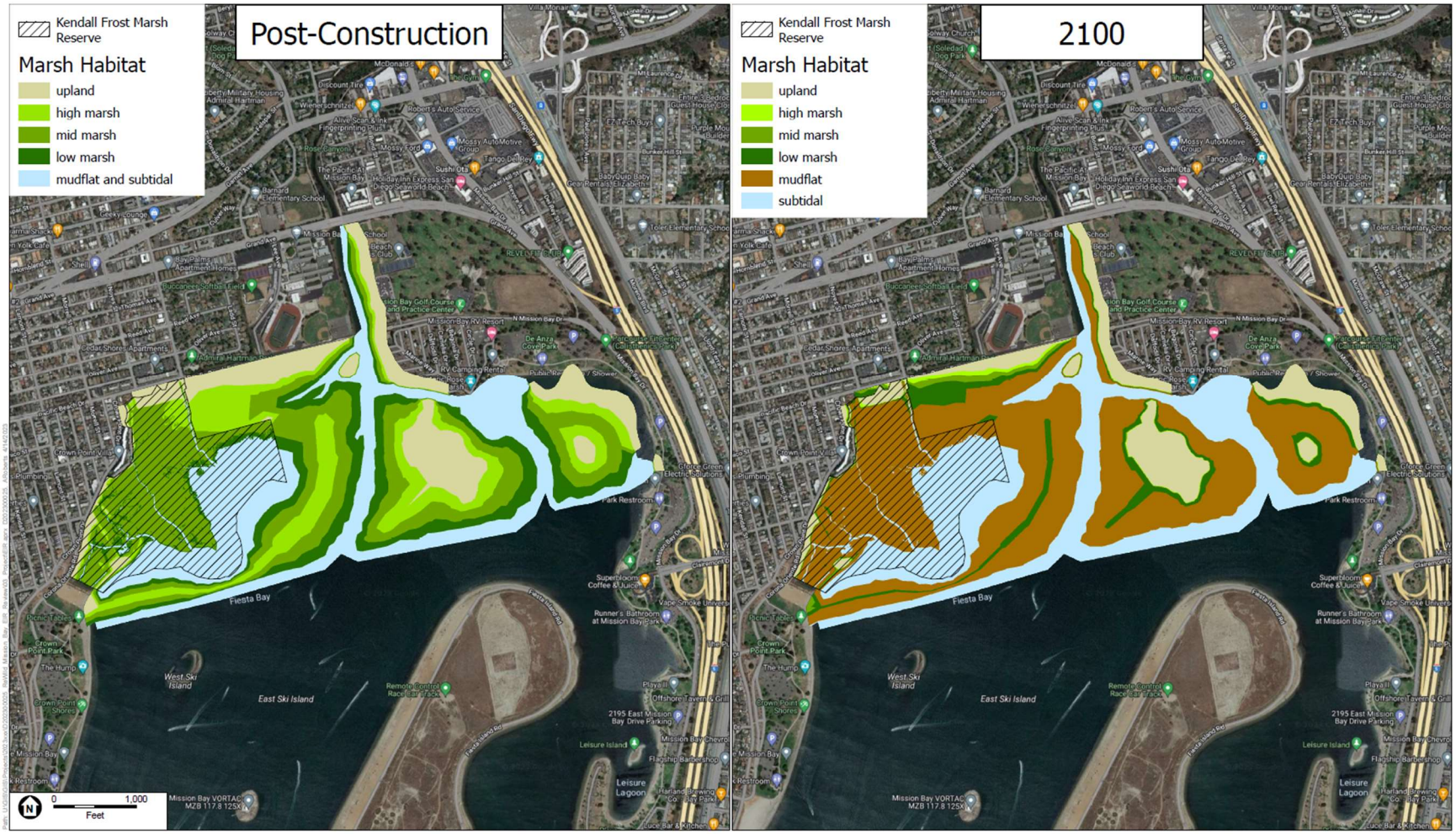
Figure 1
Wetlands Optimized Alternative Approximate Terrain



SOURCE: ESA, 2023

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

ESA