For birds, for people, for the planet.

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Subject: Mission Bay Park Improvements Program, Project No. B-18079, SCH No. 2024100048

The San Diego Bird Alliance 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 habitats in the San Diego region since 1948. We and our co-signing organizations appreciate the opportunity to comment on the Mission Bay Park Improvements Program EIR December 2025 draft, and we recommend the following clarifications and changes to align the plan with scientifically-based best practices and the most current sea level rise data in order to address key wildlife habitat and public amenities concerns.

Our comments, including questions and recommendations, focus on the following issues in the draft:

3.3	Clarification of "the Rose Creek Element"
3.3.1.1	Mitigation of negative impacts to *Dieunomia nevadensis ssp angelesia* caused by the North Fiesta Island Material Reuse plan
3.3.1.2	Design of the Tecolote Creek and Fiesta Island Causeway
4.2	Clarification of measurement references in vegetation tables
Tables 4.2 - 34	Mitigation of Rose Creek Bike Path vegetation impacts
4.8	Corrections to mislabeled Appendix and outdated Sea Level Rise models
4.8.1.4	Inclusion of mitigation plans for microplastics, including from High Density Polyethylene oyster bags and reef balls, in Hydrology and Water Quality plans
MM-BIO-2A	Prioritizing mitigation within the Mission Bay Park Improvement Zone
5.2.9 App B, G	Application of accurate, updated State of California SLR data to the plans for the Rose Creek Bike Path; application of Dark Sky principles to mitigate negative effects on wildlife,especially bird migration, of lighting plans for Rose Creek and the Robb Field/Gateway Connectivity Paths
5.3.8.1	Corrections and clarifications to the De Anza Point and Cove construction and monitoring plans, including commitment to a timely adaptive management plan in alignment with the Mission Bay Park Master Plan
Appendix M	Compliance of Lighting plans with Land Development Code and application of Dark Sky principles to mitigate negative effects on wildlife in this MHPA.

3.3 Program Elements (pg 3.2)

Please clarify if "the Rose Creek Element" relates to just the DeAnza Cove portion of Rose Creek and not the Rose Creek bike path improvements elements.

3.3.1.1 North Fiesta Island Component; Material Reuse (pg 3-8)
The site of Stockpile Site #1 and #2, as proposed, will destroy existing nesting areas for the native bee, *Dieunomia nevadensis ssp angelesia*. Stockpile site #1 will be the most destructive. These nesting sites were brought to the attention of the city in 2022 and 2023 and were included in comments to the Mission Bay Park Improvement Program (2024). The phrasing of this section stating, "The stockpile options used would be refined upon final design to avoid and minimize potential for direct impacts to sensitive habitat" indicates that the final design could potentially be changed to mitigate this significant impact to the bees' existing habitat. Will the nesting site of *Dieunomia nevadensis ssp angelesia* be taken into account in this final design with preservation of the nesting area as a goal? The loss of this species' nesting areas could be considered a significant impact as defined under CEQA Guidelines Section 15065(a), and be covered under the City's current Thresholds of Significance (City of San Diego 2022a) as described in "**4.2.3 CEQA Significant Impact; Issue 4:** Interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites." Additionally, the route outlined for the heavy construction equipment operation will also have a significant impact on the nesting site. Mitigation measures to implement are: (1) limiting construction to take place only outside the species's active flight season of September to October; (2) stockpiling the soil on Sites #2 and #3; (3) rerouting the temporary road further west of the nesting site; (4) installing protective fencing and signage around the nesting site during construction; (5) retaining and/or planting host plants. If these measures cannot be implemented, the soil should be appropriately collected, and qualified researchers/biologists should relocate the nests. Will these measures be added to the mitigation measures? Will this species be added to **MM-BIO-1 Focused Biological Species Surveys** (pg 4.2-75)?

3.3.1.2 Tecolote Creek and Fiesta Island Causeway Component; Description; Tecolote Creek (pg 3-11)
There are 2 proposed channels under the Fiesta Island Causeway. The open, earthen-bottom channel is the current proposed design. This design will provide a more natural flow with ecological value from the natural streambed and provide wildlife corridors. A proposed alternative is a box culvert, which is less desirable as it has less ecological value and would restrict tidal flows. We support the open, earthen-bottom channel as the culvert design will not benefit the planned improvements. While a box culvert may be a less expensive option to build, the cost of long-term maintenance and detrimental effects on the restoration project should exclude this option in Appendix B.

3.3.1.2 Dune habitat planned for Tecolote Creek and Fiesta Island Causeway Component; Description; Tecolote Creek (pg 3-11), **3.3.3 Upland Habitat and Preserve Expansion Element** (pg 3-29), **4.4 Wetland and Water Quality Improvement Element** (pg 4.4-11), **4.8 Hydrology and Water Quality** (pg 4.8.20)

Dune habitat restoration is mentioned in several locations in the plan and the long-term management of those habitats needs to be acknowledged and committed to in the plan. Dune habitats are almost completely lost from Mission Bay (only the San Diego River Mouth has any functioning dune ecosystem) and very valuable as habitat and as a form of coastal resilience, but in the actively used and non-native invaded communities that exist in Mission Bay currently, annual maintenance of dune habitat will be necessary to ensure its habitat value. Will the plan commit to long-term maintenance of the native plants, nesting habitat, and dune landforms that will be created?

Section 4.2 Tables 4.2-20 through 4.2-35
The following columns in these vegetation tables that include information regarding Multi-Habitat Planning Area (MHPA): Impacts within MHPA and Impacts Outside of MHPA, do not indicate what measurement the numbers represent. These areas are typically measured in acres. Please correct this error and confirm acres is the intended measurement.

4.8 HYDROLOGY AND WATER QUALITY
Preliminary Engineering Report Mission Bay Improvement Zone Bicycle and Pedestrian Paths, May 31, 2024 is incorrectly labeled as Appendix F. The correct appendix is Appendix G.
The Sea Level Rise (SLR) (OPC 2018) rise model used in Appendix B is outdated. Will this Appendix be updated to reflect the current SLR model (OPC 2024)?

Section 4.8.1.4 Water Quality
This section's extensive list of pollutants in Mission Bay does not include the increasingly dangerous and ubiquitous level of microplastics that exist in all water bodies. Current research is clear about the dangers of microplastic pollution to sea life and to humans. Careful consideration needs to be given to all elements of this improvement plan to eliminate any product that will add to microplastic pollution.
We expressed concerns in the MBPIP Framework letter regarding oyster bags traditionally being made from high density polyethylene (HDPE) and microplastic contamination as a result. The use of coconut coir bags is specified in **Appendix E: Shoreline PER** for use at De Anza Point (pg 34), but not in the other site plans that include the use of oyster bags (**4.1.2 Ventura Cove Park** and **5.6.3.Vacation Island Southwest)**. The coconut coir bags are an appropriate material for all oyster bags used in this project to prevent further degradation of water quality in Mission Bay. Additionally the **Appendix E PER** includes the possibility of using reef balls to stabilize shorelines and improve oyster habitat, but it does not specify the use of concrete constructed reef balls rather than plastic construction. Plastic reef balls will increase microplastic pollution in Mission Bay.
Will **Appendix E** be updated to clarify the use of non-plastic materials for oyster bags and reef balls at all sites?

MM-BIO-2A Compensatory Wetlands Mitigation (pg 4.2-76)
This mitigation plan should commit to mitigating wetland impacts within the Mission Bay Park Improvement Zone as a priority since the City has options when designing this plan. Will this mitigation

plan be updated to commit to mitigation within the Improvement Zone, and to work with resource agencies if mitigation is proposed outside the Zone?

Appendix G Bike Ped PER Section 5.2.9 Sea Level Rise and Lighting

This section states, regarding the Rose Creek Bike Path, that "*The lowest elevation of the Rose Creek Bike Path is at the south end and is approximately 9 feet above sea level, therefore SLR is not anticipated to be a risk to the project in the future."* However, the SLR model (OPC 2018) used in this section is outdated. At a King Tide Event held by Friends of Rose Creek and San Diego Bird Alliance on January 3, 2026 at the Rose Creek Bike path the water level was approximately 6 inches below the bike path under the Grand Ave bridge, indicating that SLR is a concern and this bike path will be subject to frequent flooding especially when the path is lowered under the bridge. This distance to sea level noted this year was without any increase from storm surge, which could raise the bay even further. Is there a plan to mitigate this problem? **Appendix B** covering the North Fiesta Island Component proposed bridges uses State of California SLR Guidance: 2024 Science and Policy Update, issued in January 2024. Will this report be updated to the current model applied in **Appendix B** to accurately reflect the impact of SLR on the changes proposed for the Rose Creek Bike Path?

Additionally, lighting is recommended along the Rose Creek and the Robb Field/Gateway Connectivity Path. The type of lighting is not addressed in **Appendix B** or in the PEIR other than a brief mention of lighting adjacent to MHPA. As these areas are part of important bird areas, lighting that complies with the Dark Sky five principles for responsible lighting should be required. We urge that the likely impacts of any changes in lighting be fully analyzed for its impacts on birds and other native wildlife, including impacts on migration and increases in vulnerability to nocturnal predators.

https://darksky.org/resources/guides-and-how-tos/lighting-principles/ Will this plan be improved to commit Mission Bay Park lighting design to dark sky principles and MHPA requirements for lighting in sensitive City areas?

Appendix E: De Anza Point and Cove

Section 5.3.8.1 details construction and monitoring plans, and states "*a monitoring program may be required by the CCC to quantify changes to the site over time.*" This language should commit the city to a management and monitoring program as is required by the De Anza Cove Amendment to the Mission Bay Park Master Plan (page 29, 67b.) to ensure adaptive management is done in a timely and iterative manner to provide for maintaining an appropriate blend of low, middle, and upper marsh habitat types that over time may be required.

We support the inclusion of incremental shoreline retreat and/or sediment augmentation as demonstrated in the US Fish and Wildlife's Seal Beach project, as an example of wetland augmentation that may be required to keep low marsh as a functioning habitat in Mission Bay.

Additionally, work on De Anza shorelines should be integrated with De Anza Cove wetlands for cut and fill purposes, as is not cost or time effective to complete separately. Phrasing on page 86 states that the De Anza Cove amendment and this restoration of shoreline project conform even though the maps are different. How does this plan account for the creation of an island at the toe of the boot and other changes

in the De Anza Cove amendment? Will this plan be updated to state that the work in the De Anza area will be integrated into the De Anza Natural plan?

Appendix M, EP-BIO-4 Lighting Standards (pg 37)
The addition of lighting is recommended along the Rose Creek and the Robb Field/Gateway Connectivity Path. This lighting is required to be in compliance with the "Land Development Code Section 142.0740 (Outdoor Lighting Regulations).
Appendix M, EP-LU-1 Land Use Adjacency Guidelines (pg 37)
"Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting." As these areas are part of important bird areas, lighting that complies with the Dark Sky five principles for responsible lighting should be required. https://darksky.org/resources/guides-and-how-tos/lighting-principles/

Thank you
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