

Attachment B to Agenda Item No. 2016-0170

South Bay WAG Consensus Comments MATRIX

COMMENT INCORPORATOR	DATE DECEMBER 16 <a href="#">(Response to comments 4/19/16)</a>
COMMENTOR South Bay Wildlife Advisory Group based on meetings of the WAG on December 3 and 10 where consensus was reached on these comments.	ORGANIZATION OF COMMENTOR
TITLE OF DOCUMENT Chula Vista Bayfront Master Plan Natural Resources Management Plan - Draft	DATE OF DOCUMENT November - 2015

NO.	PAGE NO.	ROMAN NUMERAL	LINE NO.	FIGURE / TABLE NO.	RECOMMENDED CHANGES <i>(Exact wording of suggested change)</i>	Priority	HOW COMMENT WAS INCORPORATED <i>(If not incorporated, why?)</i>
1.	1-15	1.6.4	34		Add Blue Box language stating what that WHA are SA Section 3.1		No change. This is a repeat of the Settlement Agreement. Also see page 1-7 lines 40-47 and page 1-8 lines 1-6.
<u>2.</u>	<u>1-16</u>	<u>1.6.4.I.B</u>	<u>17</u>		<u>Add Blue Box to include Settlement Agreement sections 3.1 and 3.2</u>		<u>Change language to add all of Sections 3.1 and 3.2 of the Settlement Agreement in a blue box.</u>
<del>2.3</del>	1-21		25		Although some ecosystem services provided by eelgrass are either already identified (e.g., fishery utilization [food], carbon sequestration, erosion protection, and moderation of extreme weather) or could be included in the broader “habitat for species” group identified here (e.g., nursery functions like refuge and forage habitat), additional habitat-related ecosystem services could be acknowledged. For instance, other functions eelgrass provides include primary productivity, water quality and clarity, and nutrient cycling.		Change language to add “eelgrass” symbol

South Bay WAG Consensus Comments MATRIX

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<del>3.4</del>	Ch 2, 3, Appdx D and elsewhere where SLR is addressed				<p><b>OVERALL COMMENT RELATED TO SEA LEVEL RISE:</b>                      The NRMP shall address sea level rise consistent with CA Coastal Commission’s Sea Level Rise Guidance documents, including using the National Research Council’s (2012) projections of potential sea level rise.</p>	High and addresses many issues in the NRMP	Change language to add “The Port/City will utilize as appropriate the California Coastal Commission’s Sea Level Rise <u>Policy</u> Guidance document”
<del>4.5</del>	2-1	2.0	3-4		Migratory shorebirds, such as the black brant, flock, rest and forage in the mudflats and wrack lines to regain their strength for migration for the long journey south.		<p>Change language lines 3-6 to add “Migratory shorebirds, such as the black brant, flock, rest and forage in the mudflats and wrack lines to regain their strength for migration for the long journey south.”</p> <p>Delete “Migratory shorebirds flock and find rest and forage in the mudflats and wrack lines of the intertidal shore. Ducks and geese such as the black brant rest and regain their strength for a long journey south.”</p>

South Bay WAG Consensus Comments MATRIX

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<del>5.6</del>	2-1		4-8		Eelgrass and sheltered intertidal shores are rich in juvenile fish feeding until they are large enough to gaining size and strength before entering the open ocean.		Change language to add "Eelgrass and sheltered intertidal shores are rich in juvenile fish feeding until they are large enough to enter the open ocean." Delete language "Eelgrass and sheltered intertidal shores are abundant in young fish gaining size and strength to enter ocean waters."
<del>6.7</del>	2-1		11-14		Nesting seabirds come to hatch nest and fledge their chicks on exposed flats where abundant silver fish, small enough for their young, school nearby.		Change language to add "Nesting seabirds come to nest and fledge their chicks on exposed flats where abundant silver fish, small enough for their young, school nearby." Delete language "Nesting seabirds come to hatch and fledge their chicks on exposed flats where abundant silver fish small enough for a young chick's begging school nearby."

South Bay WAG Consensus Comments MATRIX

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<del>7.8</del>	2-1		16-21		In the tidal transition that buffers storm surge and sea level rise - above the reach of today’s spring tides - salt-tolerant grasses, herbs, and shrubs provide cover for specialized insects and their pollinator host flowers, beetles and black-tailed jackrabbits.		Change language to add “In the tidal transition that buffers storm surge salt-tolerant grasses, herbs, and shrubs provide cover for specialized insects and their pollinator host flowers, beetles and black-tailed jackrabbits.” Delete language “In the tidal transition that serves to buffer storm surge and sea level rise, above the reach of today’s spring tides, salt-tolerant grasses, herbs, and shrubs provide cover for specialized insects and their pollinator host flowers, beetles and the black-tailed jackrabbit.
<del>8.9</del>	2-2	2.1	6		Replace the word “seeks” with “proposes”		Change language to add “seeks” and delete “proposes”.

## South Bay WAG Consensus Comments MATRIX

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<del>9.1</del>	2-2	2.1	14		Add a new Key Message: "Sea Level Rise will provide unique opportunities to create/restore sensitive wetland habitats as well as pose threats to established and restored sensitive wetland habitats. The NRMP's required mitigation for impacts to these habitats must account for SLR effects; it will provide baseline information to facilitate future (non-required by mitigation) enhancements of wetland habitats – and connectivity among habitats - within and adjacent to the NRMP.		Change language to add "Sea Level Rise will provide unique opportunities to create/restore sensitive wetland habitats as well as pose threats to established sensitive wetland habitats."
<del>10.</del>	2-2	2.1	48		Add that this document will utilize, to the maximum extent feasible, adaptation approaches described in the CA Coastal Commission's SLR Policy Guidance.		Change language to add "The Port/City will utilize as appropriate the California Coastal Commission's Sea Level Rise <a href="#">Policy</a> Guidance document"
<del>11.</del>	2-3	2.1	47		Add an objective for softening shorelines or creating living shorelines.		No change. Refer to objective 2.5-2
<del>12.</del>	2-4	GREENLINE			Revise to read: Prior to Project Approval of site-specific development proposals, the Port/City will review and approve studies prepared by the Project Proponent <i>or independent environmental consultants</i> that document the potential for impacts to eelgrass or open water.		Change language to add "or Port/City environmental consultant."
<del>13.</del>	2-4	II	10		The Southern Eelgrass Mitigation Plan (SCEMP) has been superseded by the California Eelgrass Mitigation Plan (CEMP), so all references to SCEMP should be changed to CEMP.		No change. Port/City understand that the SCEMP has been replaced by the CEMP, but no changes will be made to the blue box language, since they reference the controlling documents.

## South Bay WAG Consensus Comments MATRIX

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<del>14.</del>	2-6	IV.C.			The guidelines for this plan must include a discussion regarding how the NRMP will track the acres of wetland mitigation habitats that are required by the plan and how changes in sea level that alter the acreage of each of those mitigation habitat sites (defined by the amount of each mitigation site that lies within the habitat's defined elevation range relative to MLLW) will be addressed or compensated, if acreage is "lost" due to SLR. This shall be included in the follow-on study noted in chapter 7 WAG comments. This should include a discussion about how adjacent wetland habitats within the NRMP boundary that are not part of the required mitigation could be utilized as transitional habitat to compensate for "lost" mitigation acreage.		No change. No changes will be made to the blue box language, since they reference the controlling documents.
<del>15.</del>	2-6	V.A., V.B.			NMFS supports item V.A. re: taking sea level rise into account when establishing wetland and riparian buffers. We're interested in being involved in the establishment of these buffers per V.B.		No change. The WAG will be involved in future adaptive management for the CVBMP
<del>16.</del>	Various (e.g., 2-5 through 2-8)	IV, VI, VIII			Although the proposed measures appear sufficient based on an initial review, it's unclear why there appears to be some inconsistency in mitigation and restoration language under different items. For instance, p. 2-5 IV identifies compliance with USACE regulations, specific mitigation ratios, and development of a restoration plan prior to grading impacts, while VI on p. 2-7 notes specific mitigation ratios but lacks USACE regulation compliance language or an identified restoration plan. In addition, VIII notes the need for, and components to include in, a restoration plan, and specifically identifies the use of a mitigation bank as an option. Perhaps this is just a result of incorporating information from the different controlling documents, but it seems like making the actions more consistent and simplifying them overall could make the NRMP easier to understand and implement, especially for contractor(s)/consultant(s) who have not been involved in its development.		No change. No changes will be made to the blue box language, since they reference the controlling documents.
<del>17.</del>	2-10	Greenline			Revise to read: Prior to Project Approval of site-specific project plans, the Port/City will review and approve studies prepared by the Project Proponent or independent environmental consultants per paragraph XII above.		Change language to add "or Port/City environmental consultant."
<del>18.</del>	2-11 through 2-13	I-IV			WAG strongly supports these items re: 1) wetland habitat values protection; 2) habitat enhancement and priorities; 3) marine nursery and bay-estuarine fishes; and 4) habitat enhancement objectives		No change. Comment noted.

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<del>19.</del>	2-13	Greenline			WHA's include the adjacent refuge. Identify the habitat types and acreages of habitat in the Wildlife Refuge WHAs. (Missing from Figure 7-1, which is referred to in this section), last paragraph,	Figure needs update	<del>No change.</del> <del>The National Wildlife Refuge is not within the jurisdiction of the Port/City. Please reference the Refuge's Comprehensive Conservation Plan for this information.</del> <del>Change language to add additional maps indicating the Refuge acreages and habitat types.</del>
<del>20.</del>	2-13	IV.B			Strongly support establishing baseline conditions at selected, representative sites for all wetland habitat types within the NRMP to help develop the long-term monitoring and enhancement strategies that address the effects of SLR on mitigation sites and non-mitigation wetland areas.		No change. Please see Map 7-1 for baseline acreages.
<del>21.</del>	2-14	I-III			The NRMP must <i>include</i> (not "consider using") "conservation planning species" in its monitoring program. In addition, rapid assessment methods (CRAM) should be utilized to efficiently monitor general conditions within each wetland habitat type.		No change. Port/City to comply with the MMRP, CCDP and SA
<del>22.</del>	2-14		7		Please identify the section/page/table number for the list of NRMP conservation species to allow the reader to easily review the list of conservation species. We prefer it be located in Chapter 7.		No change. See Indicators of Healthy Habitats in Chapter 7
<del>23.</del>	2-14		19		This plan should summarize/integrate the long term data sets that describe the condition of the fauna, bathymetry, elevations as part of the description of the baseline conditions. Make page 1 A greenline 19-27.		No change. Information is available in bay-wide studies and the Integrated Natural Resources Management Plan for San Diego Bay.

## South Bay WAG Consensus Comments MATRIX

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<del>24</del>	2-14		37, 42		Remove “where practicable” from the text.		No change Port/City to comply with the MMRP, CCDP and SA
<del>25</del>	2-15		1,21		Remove “where practicable” from the text.		No change Port/City to comply with the MMRP, CCDP and SA
<del>26</del>	2-15	V	23-24		“Species of concern” has a specific meaning under the Endangered Species Act, and the species identified here do not qualify. NOAA “trust resources” would be a more appropriate term.		Change language to add “trust resources” and delete “Species of concern”
<del>27</del>	2-15	V.B.	29-33		<p>1) The statement that estuaries and eelgrass are habitat areas of particular concern (HAPC) is correct, and we’re glad to see it included. HAPCs are subsets of essential fish habitat (i.e., EFH HAPC instead of “Essential Fish Habitat of Particular Concern” as identified in the NRMP).</p> <p>2) Eelgrass and estuaries are designated as HAPCs under the Pacific Coast Groundfish Fishery Management Plan (FMP), and of the species noted under V.B., California scorpionfish is the only one managed under that FMP. Pacific sardine are managed under the Coastal Pelagic Species FMP, while the other species, spotted sand bass and yellowfin croaker, could still be considered NMFS trust resources (e.g., under the Fish and Wildlife Coordination Act). See also related comment # 19)</p>		<p>Change language to delete “essential fish” and add “area”.</p> <p>Add “habitat areas of particular concern are a subset of essential fish habitat under the Pacific Coast Groundfish Fishery Management Plan”.</p> <p>Add “California scorpionfish is managed under the Pacific Coast Groundfish Fishery Management Plan”.</p>



South Bay WAG Consensus Comments MATRIX

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28.	2-16	I-VI			Planning for future habitat connectivity (and specific wetland habitat creation/protection) requires a clear, specific approach for defining how sea level rise is expected to affect mitigation sites and adjacent wetlands. The NRMP must provide maps of the best available scientific estimates of SLR rise/flooding from now to 2100 and commit to adaptively modify the mitigation approach (conforming to all regulatory processes) if future SLR does not reflect those expectations.		Change language to add “The Port/City will utilize as appropriate the California Coastal Commission’s Sea Level Rise <a href="#">Policy</a> Guidance document.”
29.	2-16	I, II, III	2-23		WAG strongly supports the language regarding resilient habitats through connectivity included in these items.		Comment noted
30.	2-18		1		Development of early actions to reduce the impacts of sea level rise requires information regarding how sea level rise is expected to affect the resources of concern. The NRMP must provide maps of the best available scientific estimates of SLR rise/flooding from now to 2100 to allow planners to effectively “develop early actions to forestall or minimize the severity of the sea level rise impacts to area resources”		Change language to add “The Port/City will utilize as appropriate the California Coastal Commission’s Sea Level Rise <a href="#">Policy</a> Guidance document”
31.	2-19	I et seq.			The NRMP commits to the achieve the goal and objective to “Assure no net loss of marine, wetland and upland transition function and values due to sea level rise and other effects of climate change, within the CVBMP footprint and WHAs.” However, the NRMP acknowledges that managed retreat may be constrained by infrastructure, hence vertical migration will be critical to maintain structure and function (values) of those habitats. Potential losses of acreages of habitats are not mentioned; is the NRMP also committed to maintaining acreages of marine, wetland and transition habitats? As mentioned in preceding comments, the NRMP must include maps of projected SLR/flooding to enable the plan’s administrators/implementers/reviewers to clearly understand how the plan will address potential/likely loss of acreage of these habitats.		Change language to add “The Port/City will utilize as appropriate the California Coastal Commission’s Sea Level Rise <a href="#">Policy</a> Guidance document”
32.	2-19		1		WAG strongly supports this goal, and the supporting objective (2.4-1) and actions listed in section 2.4. These types of planning and implementation efforts will be necessary to ameliorate adverse impacts associated with climate change (e.g., sea level rise, increased storm frequency and severity)		Comment noted

South Bay WAG Consensus Comments MATRIX

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33	2-20	II	19		The City of Chula Vista has adopted a projected SLR of 1.5 feet (what time period does this involve). How does that planning standard compare with the Port of San Diego’s SLR projections? As noted previously, CA Coastal Commission’s Sea Level Rise Policy Guidance document has adopted and recommends all coastal entities use a projected SLR of 42-167 cm for the period 2000-2100). If the City of Chula Vista’s planning standard for SLR differs appreciably from that guidance then it will create problems implementing the NRMP. The NRMPs Appendix D cites the SD Bay Sea Level Rise Adaptation Strategy as a relevant source for potential SLR projections over 170 cm (> 5 feet) by 2100, which seems to conflict with the City’s planning?		Change language to add “The Port/City will utilize as appropriate the California Coastal Commission’s Sea Level Rise <a href="#">Policy</a> Guidance document”
34	2-21/22	I-V			Effective planning for SLR effects, particularly managed retreat and/or grading to encourage/facilitate habitat to transition to accommodate sea level rise, must include mapping of projected SLR so that future users of the NRMP clearly understand where and how those transitions, managed retreat were anticipated to most likely be allowed or located.		Change language to add “The Port/City will utilize as appropriate the California Coastal Commission’s Sea Level Rise <a href="#">Policy</a> Guidance document”
35	2-23				Greenline 32-44 related to promotion of soft infrastructure	high	No change. The Port/City will promote soft infrastructure.
36	2-24		26		If sediment from dredging is placed on beaches, it will be difficult to prioritize the following measure identified on line 26 “B. A process for beneficial re-use of dredge material as a source for benefiting marine habitat restoration and enhancement of marine life could include, but would not be limited to the following: 1. Identify areas where natural sediment delivery could be enhanced or improved for habitat benefit. 2. Identify areas that may require active placement of sediment to increase resiliency to sea level rise.”		Comment noted.

## South Bay WAG Consensus Comments MATRIX

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<del>37</del>	2-26	I	10		Item I.A specifies acres of (mitigation) habitats restored as an indicator of multiple benefits to core resources. This is one of the few specific references to acres/acreages of (marine, wetland, transition) habitats being tracked and used as measures of NRMP effectiveness (elsewhere the document cites functions and values – not acres of those habitats). The NRMP needs to be consistent in specifying what is required to be measured and monitored as part of ensuring the plan fully meets its commitments.		Comment noted
<del>38</del>	3-1				This section must describe how watershed and storm water (water quality BMPs) planning and projects will incorporate sea level rise/flooding. The current plan text makes no references to SLR. If appropriate, this section should cross-reference relevant parts of the NRMP that address these concerns.		Change language to add “The Port/City will utilize as appropriate the California Coastal Commission’s Sea Level Rise <a href="#">Policy</a> Guidance document”
<del>39</del>	3-6				Line 4: Greenline related to educating marina users on pollution prevention.		No change The Chula Vista Marina’s are members of the Clean Marina Program. This program provides boater best management practices to prevent pollution.
<del>40</del>	3-5				Greenline II A. related to promotion of water conservation		No change. The City has a water conservation ordinance and the Port a water conservation policy.
<del>41</del>	3-11	I.A			Ensuring the long-term viability of storm water facilities and operations/maintenance requires that those facilities have been planned to accommodate sea level rise/flooding.		Change language to add “The Port/City will utilize as appropriate the California Coastal Commission’s Sea Level Rise <a href="#">Policy</a> Guidance document”

## South Bay WAG Consensus Comments MATRIX

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42	3-6, 3-7	II.B.3, II.D.			The recommendations regarding marina and boating impacts are positive, including documenting clean marina practices (e.g., cleanmarina.org) and encouraging alternative hull paints.		Comment noted.
43	3-8	II			NMFS concurs with the recommendation to implement bioengineering alternatives for flood protection over hard solutions such as concrete or riprap. However, we believe the wording should be changed to read, "Bioengineering alternatives shall be preferred for flood protection over "hard" solutions..."		No changes will be made to the blue box language, since they reference the controlling documents.
44	3-14	I-IV	16-21		These items aimed at preventing the introduction and spread of invasive species are a positive addition. Regarding IV, though it lacks a funding mechanism, NMFS is pleased to see this measure re: reducing the likelihood of invasive species proliferation through restoring natural habitat and minimizing hard structures		Comment noted
45	4-1		3-6		The CVBMP development strives to be a model for supporting and sustaining thriving native plant, wildlife and aquatic habitats adjacent to an urbanized area providing a personal interaction with nature.	important	Change language to add "aquatic"
46	4-1		6-7		DELETE "Vision for the Future" it is a remnant of earlier writing.	typo	Change language to delete "Vision for the Future"
47	4-1		17-18		Delete the extra period in "To achieve this, innovative strategies are proposed in built environment design, park design, maintenance, and public use management "	typo	Change language to delete
48	4-1		22-25		The goal is to accommodate the transformation of the CVBMP project footprint and the increased use the new development will attract, while preserving and sustaining the unique wildlife communities and habitats of South San Diego Bay.	Important clarification	Change language to delete "promote"
49	4-3			4-1	This table is about the Sweetwater District. The 25 foot wide path does not apply to the Sweetwater district. Delete this sentence from this table. "Shoreline promenades shall be a minimum of 25 feet in width allowing both pedestrians and bicyclists and shall be constructed directly along the waterfront where feasible and maintained free of private encroachment around the Bayfront."	Extremely important	No change Future review as part of adaptive management.

## South Bay WAG Consensus Comments MATRIX

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<del>50.</del>	4-9	III	5,6&7		It looks like this will require special permits to pull invasive species. Add the word "native" as in: III. Collection of <i>native</i> plant materials is only allowed where expressly permitted; specific descriptions and instructions on plant collections will be detailed and, where applicable, educational signage will be present.	important	Change language to add "native"
<del>51.</del>	4-910		1-6		Several important concepts related to protecting NMFS trust resources, including sea turtles, marine mammals, and eelgrass, are captured in this side note. However, specifically identifying the measures, or a subset of them, that accomplish these objectives within this sidenote would be valuable. We did not notice them within this chapter (e.g., sea turtles are not mentioned again until Ch. 7)		No change. Addressed elsewhere, refer to 5 mph speed limit in south bay.
<del>52.</del>	4-11	V	13-14		This same, or a similar, measure would be appropriate to clearly demarcate channels along waterfront to avoid impacting eelgrass habitat. ATONs (buoys/markers) are not always sufficient in "back bay" areas to ensure boaters stay within channels. Amend to add "...channels and protect the edge of sensitive mud flats and channels and to demarcate them from navigation channels"		Change language to add "channel"
<del>53.</del>	4-10				[change clapper rails to "Ridgway's rails"]	editorial	Language change to add "Ridgway's Rail formerly referred to as clapper rail"

South Bay WAG Consensus Comments MATRIX

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54.	4-11 and then 4-9	IV	1-8		Paragraph IV is more about buffers than water areas. It should be moved up to in front of objective 4.3-2 on page 9. Also extent the green vertical line to include heading IV and its subheadings to show how the blue text will be implemented.	important	<p><u>No change.</u>  <u>Comment noted</u>  <u>Add footnote for:</u>  <u>V. A-C The management actions for section V. A-C are priority actions that will be a focus for early grant requests. In the event that grant funding is not secured prior to the issuance of a building permit in either the Sweetwater District (including the park), the Otay District, the residential development, or the resort conference center, O&amp;M, Port Environmental funds, or other funding will be used to ensure these actions are implemented prior to issuance of the Certificate of Occupancy on any project located within the Sweetwater District (including the park), the Otay District, or the resort conference center. If the first development is the residential development, the management actions contained in V. A-C will be implemented no later than 90 days from</u></p>

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							<a href="#">management actions contained in V. A-C will be implemented no later than 90 days from the issuance of the first Certificate of Occupancy for any phase of any residential development.”</a>
<del>55.</del>	4-11	V	9-20		Extend the green vertical line to include heading V and its subheadings related to bird flushing.	important	<a href="#">No change Port/City to comply with the MMRP, CCDP and SA Include in footnote from above</a>
<del>56.</del>	4-11	V	9-12		To protect native wildlife and habitats, protective measures for vulnerable mudflats and marine areas (or portions of them during critical seasons) shall be established to reduce visitor intrusion into those areas.	important	<a href="#">Change language to add “shall be established” Include in footnote from above</a>
<del>57.</del>	4-12		1-4		Design outdoor areas intended for public use, wildlife preserves, or treatment to minimize the need for maintenance that would otherwise impact native wildlife or plant communities.		Change language to delete “vegetation” and add “plant”
<del>58.</del>	4-12	I	9-10		Areas zoned for more intense use would likely require more maintenance than those zoned for infrequent or less impactful use.	Very important	Change language to delete “frequent” and add “infrequent and less”
<del>59.</del>	4-12	B.			If required by law, federal and/or state permits should be obtained prior to commencement of any portion of the project. (CWA, Section 404; Fish and Game Code Section 1600 et seq.)		No change If required, permits will be obtained

South Bay WAG Consensus Comments MATRIX

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60.	4-12	III	20-21		Establish protocols for routine and emergency maintenance activities that retain habitat value and avoid the breeding season (as feasible), so that while human life, health, and safety are given precedent, sensitive resources are also protected, particularly in stormwater basins or treatment areas.	important	<p>Change language to add “Establish protocols for routine and emergency maintenance activities that retain habitat value and avoid the breeding season (as feasible), so that while human life, health, and safety are given precedent, sensitive resources are also protected, particularly in stormwater basins or treatment areas.</p> <p>And delete “Establish prescriptions for routine and emergency maintenance activities that retain habitat value and avoid the breeding season (as feasible), so that human life, health, and safety are given precedence, but sensitive resources are also protected, as in stormwater basins or treatment areas.”</p>



## South Bay WAG Consensus Comments MATRIX

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<del>61</del>	4-13	III	1-4		In areas with suitable nesting habitat for migratory birds, schedule construction so that it begins and is completed before the avian breeding season (January 15 through August 31). This will allow any necessary habitat removal prior to nesting and encourage birds to selectively nest away from the construction disturbances.	important	No change. Construction will be scheduled to start prior to the nesting season.
<del>62</del>	4-14	I	6,8,& 9		<p>Move heading I. below the blue section A., B., and C which it supports. This paragraph does not comply with the settlement agreement as shown in heading B. below. "I. Fireworks shows are discouraged during California least tern nesting season (March 15 through August 31) due to the potential for disruption of nesting colonies. Per the Settlement Agreement and the MMRP of the EIR"</p> <p>We suggest it be changed to something like: "I. Fireworks shows are not allowed during California least tern nesting season (March 15 through August 31) except on July 4, due to the potential for disruption of nesting colonies per the Settlement Agreement and the MMRP of the EIR. Any fireworks on the Bayfront must be specifically approved the agencies regulating water quality, air quality, and wildlife protections.</p> <p>Extend the green line below the blue ABC section to include the modified and relocated heading I. and headings II and III</p>	Extremely important	<del>No change</del> <a href="#">language to delete lines 6-8.</a> <a href="#">Port/City to comply with the MMRP, CCDP and SA</a>
<del>63</del>	4-15	III	1-4		Add Greenline and rewrite to read <i>Fireworks shows should be low-noise producing and the display altitude should be adjusted pursuant to the best available science to minimize disruption of bird species. Duration of shows should remain as short as feasible to limit the duration of potential noise impacts. Whirling, sonic booms, and similar types of fireworks are discouraged.</i>	important	<del>No change</del> <a href="#">language first sentence to add</a> <a href="#">"Fireworks are encouraged to be low-noise producing and display altitudes adjusted pursuant to the best available science to minimize disruption of bird species."</a> Port/City to comply with the MMRP, CCDP and SA

South Bay WAG Consensus Comments MATRIX

NO.	PAGE NO.	ROMAN NUMERAL	LINE NO.	FIGURE / TABLE NO.	RECOMMENDED CHANGES <i>(Exact wording of suggested change)</i>	Priority	HOW COMMENT WAS INCORPORATED <i>(If not incorporated, why?)</i>
64	4-17	VI	1		Change the “should” to “shall” in “VI. Construction biomonitors <b>shall</b> monitor noise levels at construction sites to ensure compliance with noise regulations, as well as monitor any adverse response of wildlife to peak noises.	important	No change. Port/City to comply with the MMRP, CCDP and SA
65	4-18	I,II,III,IV	9-23		Move these 4 headings to below the blue text that follows them. Extend the green line below the upper blue text block on 4-19 to cover these four headings	important	No change. Port/City to comply with the MMRP, CCDP and SA
66	4-19	IV B. 5, (below the blue text block )	Above line 2		Add a sentence: <i>All spike strips and other predator exclusion devices will be checked and cleaned, repaired, or replaced as needed at least twice each year to maintain their effectiveness, preferably before nesting season and before the winter migrants arrive.</i> Extend the green line to include this sentence	Extremely important	Change language to add “all predator exclusion devices will be checked and cleaned, repaired, or replaced as needed following site inspections” Add green line
67	4-19	Lines 4-7			Greenline a Trash and Predator Management Plan	Very important	Change to add green line
68	4-20	VI. B	2-7		The Feral Cat Coalition’s role is to implement the neuter/release programs not assess their impacts on wildlife. In our contacts with them, they have no interest in the impacts of the practice on native species. Modify these lines to read: “B. Integrate other programs and materials as appropriate to educate the public about feral cat and dog prevention and management to promote synergy of efforts. For example, use American Bird Conservancy <b>or National Audubon Society materials</b> and/or work with the Feral Cat Coalition of San Diego and the San Diego County Veterinary Medical Association to provide education on the catch and spay/neuter program and its potential impact on native species.”	extremely important	Change language to add “National Audubon Society”.

## South Bay WAG Consensus Comments MATRIX

NO.	PAGE NO.	ROMAN NUMERAL	LINE NO.	FIGURE / TABLE NO.	RECOMMENDED CHANGES (Exact wording of suggested change)	Priority	HOW COMMENT WAS INCORPORATED (If not incorporated, why?)
<del>69.</del>	4-20	VI. B and C	2-9		Extend the green line to cover headings B. and C.		No change. Port/City to comply with the MMRP, CCDP and SA
<del>70.</del>	4-20	C			C. Coordinate with other jurisdictions, as appropriate, to address adjacent cat colonies that affect native wildlife in the CVBMP footprint. [almost the first use of "fauna" in the NRMP]	important	Change language to add "wildlife" and delete "fauna"
<del>71.</del>	4-20	I. A,B,C	14-27		Extend the green line to cover AB&C to identify how the blue text is to be implemented.		No change. Port/City to comply with the MMRP, CCDP and SA
<del>72.</del>	4-22	C.	Below line 4		Change this paragraph to become consistent with the Settlement Agreement: "C. Pets <del>should</del> <b>shall</b> not be allowed on <b>any spur</b> trails in Buffer Areas unless under the owner's control and held on a leash, due to potential for disturbance to native species."	Very important	Change language to delete "pets" "should" "spur" and add "dogs" "shall" "any"
<del>73.</del>	4-22	F			F. Strict enforcement of leash laws with significant fines for repeated infractions may be necessary to establish a culture of compliance on spur trails.	Very important	<del>No change.</del> <del>Existing laws will be enforced pursuant to guidance in the NRMP.</del> <u>Change language to add "F. Strict enforcement of leash laws and disposal of pet waste in accordance with existing regulations will be pursued."</u>
<del>74.</del>	4-22	III.	Between lines 4&5		Add a subheading under item III saying something like "Regulations shall be adopted requiring that dogwalkers pick up all droppings from their pets and properly dispose of them. Procedures shall be put in place to enforce those regulations.	Very important	No change. Existing laws will be enforced pursuant to guidance in the NRMP.

## South Bay WAG Consensus Comments MATRIX

NO.	PAGE NO.	ROMAN NUMERAL	LINE NO.	FIGURE / TABLE NO.	RECOMMENDED CHANGES (Exact wording of suggested change)	Priority	HOW COMMENT WAS INCORPORATED (If not incorporated, why?)
<del>75</del>	4-23	II.	Between lines 7&8		Add a subheading under heading II saying something like "A. Drainage from the bermed area around dumpsters shall drain into the municipal wastewater system, if feasible, and in no case shall they drain into any stormwater device that will drain into the WHA or the Bay.	Very important	No change. To be reviewed during design.
<del>76</del>	4-23	VI.	Between lines 11&12		Add the words, " <b>are resistant to gulls and other nuisance animals</b> " as in VI. In addition to trash can design guidelines provided in this section, use trash can designs that are spill resistant, discourage vandalism, <b>are resistant to gulls and other nuisance animals</b> , and have low maintenance and energy requirements (one possible option is a solar-powered, compacting trash can design) and shall have lids.	important	Change language to add "are resistant to gulls and other nuisance animals".
<del>77</del>	4-23	A	14-15		To reduce the amount of packaging associated with products or consumable items that they sell, prohibit vendors from using single-use plastic bags or Styrofoam containers. Use of non-recyclable packaging should be strongly discouraged.	Very important	No change Shall encourage reduction of consumable items
<del>78</del>	4-25	F	16		Add the words " <b>which are directed downward and</b> " and "shall" as in "F. Where feasible, low light-emitting diode (LED) lights <b>which are directed downward and</b> built into the ground <del>may</del> <b>shall</b> be used.	important	No change. Port/City to comply with the MMRP, CCDP and SA
<del>79</del>	4-25 Or	H			For all publically owned lighting, dark sky spectrum lights shall be used.	Very important	No change. Consider in design review.
<del>80</del>	4-26	I	1-4		This paragraph is about park lighting, not construction lighting. Move it down to below blue paragraph II D. Also extend the green line to include the text in heading I.	important	No change. Port/City to comply with the MMRP, CCDP and SA
<del>81</del>	4-28	XII			[addition] Dark sky spectrum lighting should be encouraged in the built environment.	Very important	No change. Consider in design review.

South Bay WAG Consensus Comments MATRIX

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82	5-1		5-8		Built environments often have a net negative impact on ecosystem services (i.e., they use more than they produce). The purpose of this chapter is to focus on strategies to provide a net benefit to the environment.	clarification	Change language to delete “often” “attention on strategies that take less from nature and instead give back.” Add “strategies to provide a net benefit to the environment”

South Bay WAG Consensus Comments MATRIX

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83	5-1		9-13		Maximizing ecosystem services in the built environment begins with principles of sustainable design of buildings and landscapes. Net-positive impacts to ecosystem services can be reached using green space between buildings through ecological grounds design and maintenance, stormwater retention, wildlife friendly gardens and parks, and edible gardens.	clarification	Change language to add “Maximizing ecosystem services in the built environment begins with principles of sustainable design of buildings and landscapes. Net-positive impacts to ecosystem services can be reached using green space between buildings through ecological grounds design and maintenance, stormwater retention, wildlife friendly gardens and parks, and edible gardens.” And delete “Maximizing ecosystem services in the built environment begins with principles of sustainable design of buildings and a number of opportunities within the green spaces between buildings, grounds design and maintenance, stormwater retention, wildlife friendly gardens and parks, and food gardens.

South Bay WAG Consensus Comments MATRIX

NO.	PAGE NO.	ROMAN NUMERAL	LINE NO.	FIGURE / TABLE NO.	RECOMMENDED CHANGES <i>(Exact wording of suggested change)</i>	Priority	HOW COMMENT WAS INCORPORATED <i>(If not incorporated, why?)</i>
84	5-1		18-20		By taking less and providing more, the balance sheet of ecosystem services consumed and produced within the built environment and open space approaches a neutral to positive impact as compared to the current environment.		Change language to add “a neutral to positive impact as compared to the current environment.” And delete “neutral to positive, favoring ecosystem services produced.”

South Bay WAG Consensus Comments MATRIX

NO.	PAGE NO.	ROMAN NUMERAL	LINE NO.	FIGURE / TABLE NO.	RECOMMENDED CHANGES <i>(Exact wording of suggested change)</i>	Priority	HOW COMMENT WAS INCORPORATED <i>(If not incorporated, why?)</i>
85	5-1		21-23		A compelling case can be made that implementation of reasonable and sustainable design, construction, and management guidelines for the built environment, prior to the initiation of the CVBMP development, can provide ecosystem services.		Change language to add “A compelling case can be made that implementation of reasonable and sustainable design, construction, and management guidelines for the built environment, prior to the initiation of the CVBMP development, can provide ecosystem services.”  And delete “A compelling case can be made at the initiation of the CVBMP development for implementation of reasonable and sustainable design, construction, and management guidelines for the built environment that can provide ecosystem services.”
86	5-1		53-54		Integration of open space with the built environment supports all residents, employees, guests and the general public and draws people to the Chula Vista Bay Front.	important	Change language to delete “site” and add “Chula Vista Bayfront”
87	5-3		1-3		Optimize ecosystem services in the built environment by designing for low impact development (LID) conservation of natural resources and ecosystem benefits (Port of San Diego Climate Action Plan 2013). [there are two footnote references to McDonough – is this intentional?]		Comment noted. 2 separate footnotes, both numbered 1



South Bay WAG Consensus Comments MATRIX

NO.	PAGE NO.	ROMAN NUMERAL	LINE NO.	FIGURE / TABLE NO.	RECOMMENDED CHANGES <i>(Exact wording of suggested change)</i>	Priority	HOW COMMENT WAS INCORPORATED <i>(If not incorporated, why?)</i>
<del>88.</del>	5-4	II. B.	Between lines 3&4		Add a subheading under II. B. stating something like: When greywater is used for irrigation, the soil in the area being irrigated will be periodically monitored for buildups of undesirable conditions or materials such as salinity, acidity or alkalinity, nutrients, surfactants, etc.	Very important	Change language to add "When greywater is used for irrigation, the soil in the area being irrigated will be periodically monitored."
<del>89.</del>	5-7	I.A	8-10		Extent the green line to include the text in A to indicate how the blue text will be implemented		Change language to add "allow for" and delete "dedicate". Add green line
<del>90.</del>	5-14	Add line 6			Collaborative efforts will be made to work with Coastal Commission and Port and City to effect an immaterial amendment to reduce minimum path widths from 12 to 6 feet for meandering paths in Sweetwater and Otay districts.		No change Future review as part of adaptive management.

South Bay WAG Consensus Comments MATRIX

NO.	PAGE NO.	ROMAN NUMERAL	LINE NO.	FIGURE / TABLE NO.	RECOMMENDED CHANGES <i>(Exact wording of suggested change)</i>	Priority	HOW COMMENT WAS INCORPORATED <i>(If not incorporated, why?)</i>
91	5-17		6-7		<p>Much of the land designated for Buffer Areas or parks, especially in the Otay District, are populated with high concentrations of invasive, noxious, non-native plant species, and may require a multi-year program of eradication prior to restoration or improvement. Greenline lines 6-8</p>	Very Important	<p><u>Add footnote: "The management actions in 5.4.1, are priority actions that will be a focus for early grant requests. The Port/City shall revegetate all areas of the SP-1 Buffer, except areas with existing sensitive habitat, surrounding Parcel S-1 as habitat mitigation related to that project. In the event that grant funding commitments are not secured prior to the issuance of a building permit in either the Sweetwater District (including the park) or the Otay District, O&amp;M, Port Environmental fund, or other funding will be used to ensure completion of these actions in the adjacent buffer area prior to issuance of the Certificate of Occupancy.</u></p> <p><del>No change- Seek grant funding to implement.</del></p>

## South Bay WAG Consensus Comments MATRIX

NO.	PAGE NO.	ROMAN NUMERAL	LINE NO.	FIGURE / TABLE NO.	RECOMMENDED CHANGES (Exact wording of suggested change)	Priority	HOW COMMENT WAS INCORPORATED (If not incorporated, why?)
92	5-18		1-3		Created wetlands for stormwater treatment that exclusively use native plant species that provide habitat value to wildlife and incorporate such wetland into the landscape design of open space. Native species should be defined as native to southwest coastal San Diego..	Very important	No change. Consider in design review and will seek grant funding to implement.
93	5-18, 121	5.4-3, III	Between lines 6&7		Add a third subheading, something like: "III. Include features that will allow removal of sediments, litter, and invasive species in ways that minimize the temporary reduction of the wetlands ability to improve water quality or support native wildlife.	Very important	Change language to add "Include features that will allow removal of sediments and litter to improve water quality or support native wildlife."
94	5-18, 121	5.4-5, IV	Between lines 6&7		Add a fourth subheading, something like: IV. Work with the agencies to develop a design and maintenance plan that will allow the agencies to issue permits for long term maintenance of the created wetlands. This should assure that the created wetlands will be able to provide optimum functioning for water quality and habitat long into the future.	Extremely important	No change. ACOE and RWQCB wetland permits include long term maintenance requirements.
95	5-19	5.4-5	12		Delete the words: "With the exception of European honeybees,". because they are not native pollinators.		Change language to delete "With the exception of European honeybees"
96	5-19	5.4-6	23		Add the word fauna as in: "about the local flora, <i>fauna</i> , and ethnobotany."		Change language to add "fauna".
97	5-19		31-32		Edible gardens within the residential area are encouraged for individual and community use.		Change language to delete "food" and add "edible"
98	5-19		36-37		Interpret vegetable [edible] gardens as a sustainable alternative to food transported long distances.		Change language to delete "food" and add "edible" for first part of sentence.

South Bay WAG Consensus Comments MATRIX

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99.	5-19		40-41		Incorporate bird-nesting boxes and bat houses, where feasible, to encourage native insect-eating species in the edible gardens (and throughout the CVBMP footprint).	important	Language changed to delete "food" and add "edible" No change - Bat houses not incorporated due to potential issues for public safety.

South Bay WAG Consensus Comments MATRIX

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<del>100</del>	5-19	Line 3			Remove sentences 2 and 3 and move footnote into text and add: San Diego salt grass, seashore paspalum (non-native, non-invasive), and other native grasses selected for bio-swales.	Important	<p><u>No change</u></p> <p><u>Change language to delete lines 1-4 and add "Turf Grass Use. Grass selection will be based on proposed uses and functions of the grass. Mowed turf grass is native or other drought tolerant type, and provides functional gathering spaces. Meadow turf (mow free) composed of native species may also be used, where appropriate.</u></p> <p><u>A. Native species that withstand mowing are cool season grasses. Native bent grass (Agrostis pallens) is the first choice for California native lawn areas in low-impact areas. It is extremely drought tolerant, withstands low mowing, and provides an effective weed barrier. With occasional summer irrigation, it maintains a deep green color.</u></p>

## South Bay WAG Consensus Comments MATRIX

NO.	PAGE NO.	ROMAN NUMERAL	LINE NO.	FIGURE / TABLE NO.	RECOMMENDED CHANGES (Exact wording of suggested change)	Priority	HOW COMMENT WAS INCORPORATED (If not incorporated, why?)
							<a href="#">B.The high-traffic areas may use dwarf Bermuda grass, such as Tifway.</a> <a href="#">C. Bio-swales may include San Diego salt grass, seashore paspalum (non-native, non-invasive), and other native grasses.</a>
<del>101</del>	5-20	5.5-2, V	36		The goal for this section is “Promoting Wildlife”, but very little is said about wildlife in this section. So please add another heading, something like: “V. Emphasize plants that provide support value for a variety of wildlife species, especially those that will be interesting and educational to park visitors.”	important	Change language to add “V. Emphasize plants that provide support value for a variety of wildlife species, especially those that will be interesting and educational to park visitors.”
<del>102</del>	5-20	I	7-10		Given that parks and open space represent the only limited areas where habitat migration may be possible, implementing this strategy would demonstrate a real commitment to the overall, core goal of promoting wildlife identified in this section.		Comment noted.
<del>103</del>	5-22	VII	3-4		Where appropriate and previously planned, design specific areas for more intensive use. Provide for more intensive management of these areas.	important	No change Comment unclear
<del>104</del>	5-22				Greenline 9-14 to design for children and to maximize natural experience in Sweetwater and Otay parks		Change language to add green line

## South Bay WAG Consensus Comments MATRIX

NO.	PAGE NO.	ROMAN NUMERAL	LINE NO.	FIGURE / TABLE NO.	RECOMMENDED CHANGES (Exact wording of suggested change)	Priority	HOW COMMENT WAS INCORPORATED (If not incorporated, why?)
<del>105</del>	5-23	II	24-25		Avoid drip irrigation on drought tolerant plants because such technology hydrates concentrated areas leaving interspaces completely dry.		Change language to delete "as this" "wets a" "and often leaves the" and add "because such" "hydrates" "leaving"
<del>106</del>	5-23	5.6-1, I. C			Add a subsection something like: "C. Include in the garden areas information and displays demonstrating the environmental and health benefits of benign pest control measures such as IPM.	important	Change language to add "C. Include in the garden areas information and displays demonstrating the environmental and health benefits of benign pest control measures such as IPM."
<del>107</del>	5-23	objective			Invasive Species Management. An invasive plant management plan is in place that reinforces strict adherence to pesticide label instructions and restrictions for chemicals carrying a caution warning label, DELETE "and bans the use of pesticides with warning or danger safety labels."	important	Change language to delete "and bans the use of pesticides with warning or danger safety labels"
<del>108</del>	5-23				Greenline lines 11-14 related to existing IPM policies of the Port and City		Change language to delete "individual" and add green line
<del>109</del>	ADD in 5-18	Line18			Where possible, drought-tolerant landscaping will emulate the habitat structure and specific components of coastal sage scrub, coastal strand and maritime succulent scrub.		Change language to add "Where possible, drought-tolerant landscaping will emulate the habitat structure and specific components of coastal sage scrub, coastal strand and maritime succulent scrub."

## South Bay WAG Consensus Comments MATRIX

NO.	PAGE NO.	ROMAN NUMERAL	LINE NO.	FIGURE / TABLE NO.	RECOMMENDED CHANGES (Exact wording of suggested change)	Priority	HOW COMMENT WAS INCORPORATED (If not incorporated, why?)
<del>110</del>	6-0		9		Add line. "Education is a key element in both appreciating the natural environment and supporting ongoing conservation efforts."		Change language to add "Education is a key element in both appreciating the natural environment and supporting ongoing conservation efforts."
<del>111</del>	6-0		1		Remove word "varied" from sentence		Change language to delete "varied"
<del>112</del>	6-1	I	15-16		Education and stewardship that will reach diverse audiences and provide a range of experiences designed to inspire a commitment to conservation.		Change language to delete "and education to inspire stewardship" and add "designed to inspire a commitment to conservation"
<del>113</del>	6-1	II	26		Change the word "Post" to "Pre"		Change language to delete "post" and add "pre"
<del>114</del>	6-1	III	28-29		Education that emphasizes both local and global connections to create a model of sustainable living and ecosystem connectivity.		Changed language to delete "exhibits" and add "emphasizes both local and"
<del>115</del>	6-2		9		Add a new bullet that reads: "Community organizations and other Non – Profit organizations"		Changed language to add "Community and other Non – Profit organizations"
<del>116</del>	6-2	III	18		Edit sentence so it reads: "Elected officials, local politicians, government directors and other personnel, and governmental staff and personnel."		Changed language to add "and other personnel, and governmental staff"



South Bay WAG Consensus Comments MATRIX

NO.	PAGE NO.	ROMAN NUMERAL	LINE NO.	FIGURE / TABLE NO.	RECOMMENDED CHANGES <i>(Exact wording of suggested change)</i>	Priority	HOW COMMENT WAS INCORPORATED <i>(If not incorporated, why?)</i>
<del>117</del>	6-3	VIII	18-19		Edit Sentence: "Ensure adequate orientation information is provided within the built environment (e.g., hotels and convention center) within CVBMP site (e.g., maps, pamphlets, signage, QR codes)"		Changed language to add "Ensure adequate orientation information is provided within the built environment (e.g., hotels and convention center) within CVBMP site (e.g., maps, pamphlets, signage, QR codes)" And delete "Ensure adequate orientation information is provided at the site (e.g., auditorium, maps)."
<del>118</del>	6-4	XIV	18		Edit Sentence: Change the word "phone" to "computer or phone application"		Changed language to add "computer or"
<del>119</del>	6-5	III	14		Make this a green line and add additional text after existing sentence so entire bullet reads: "Coordinate activities with hotels and the on-site conference center that includes establishing displays and making materials available (brochures, maps, environmental concierge, etc. and incorporate use of produced Bayfront video) to educate guests on the Chula Vista Bayfront and wildlife areas. This will help instill the uniqueness of the location and to create environmental awareness and respect of the Chula Vista Bayfront."		Change language to add ""Coordinate activities with hotels and the on-site conference center that may include establishing displays and making materials available (brochures, maps, concierge, etc. and incorporate use of produced Bayfront video) to educate guests on the Chula Vista Bayfront and wildlife areas."

## South Bay WAG Consensus Comments MATRIX

NO.	PAGE NO.	ROMAN NUMERAL	LINE NO.	FIGURE / TABLE NO.	RECOMMENDED CHANGES (Exact wording of suggested change)	Priority	HOW COMMENT WAS INCORPORATED (If not incorporated, why?)
<del>120</del>	6-5	V	15		Change "clapper rail" to "Ridgway's rail"		Change language to "Ridgway's rail formerly known as the clapper"
<del>121</del>	6-5	VII	18-21		Post a visible community bird, wildlife and butterfly list to show what has been observed. Have a place where people can post what they have seen lately, such as an interpretive center, on a bulletin board, or online. Highlight existing migration routes and consider creating animal way stations (e.g., for butterflies).		Change language to add "wildlife"
<del>122</del>	6-5	VIII	(added)		Post a visible community board for fisherman that includes date, species, length, weight and location of daily catch and method (bait, lure, fly etc.). Create application that allows reporting to appropriate wildlife agency.		Change language to add "Post a visible community board for fisherman that includes date, species, length, weight and location of daily catch and method (bait, lure, fly etc.). Create application that allows reporting to appropriate wildlife agency."
<del>123</del>	6-5	I	12		Remove the word "tie-in and"		Change language to delete "tie-in and"
<del>124</del>	6-5	VI	17		Add "open space and" before protected habitat		Change language to add "open space and"
<del>125</del>	6-6	VI			Discourage illicit activity through wildlife friendly lighting and enforcement of closing hours.		Change language to add "wildlife friendly lighting".

South Bay WAG Consensus Comments MATRIX

NO.	PAGE NO.	ROMAN NUMERAL	LINE NO.	FIGURE / TABLE NO.	RECOMMENDED CHANGES <i>(Exact wording of suggested change)</i>	Priority	HOW COMMENT WAS INCORPORATED <i>(If not incorporated, why?)</i>
<del>126</del>	6-6		23-27		<i>Ecological and Cultural Evolution of the Landscape.</i> Inform residents, visitors, and employees of the evolution of the landscapes of Chula Vista. Engage the community and visitors on the historical and cultural connection of native tribes with the natural resources.		Changed language to add “ <i>Ecological and Cultural Evolution of the Landscape.</i> ” Inform residents, visitors, and employees of the evolution of the landscapes of Chula Vista. Engage the community and visitors on the historical and cultural connection of native tribes with the natural resources.”
<del>127</del>	6-6	II	28-30		“consider re-creating a hands on interactive setting that would depict the Kumeyaay use of natural resources” NEW [we know a village was never located in this area and the Kumeyaay have expressed in the past not wanting to display a village in the incorrect area]	NEW	Changed language to delete “Collaborate with the Kumeyaay Nation tribal representatives to provide educational resources, such as cultural demonstrations” and add “consider re-creating a hands on interactive setting that would depict the Kumeyaay use of natural resources.”
<del>128</del>	6-6	III	32-33		Describe what has brought people to the Chula Vista area historically and currently.		Changed language to delete “and how they tie together”

South Bay WAG Consensus Comments MATRIX

NO.	PAGE NO.	ROMAN NUMERAL	LINE NO.	FIGURE / TABLE NO.	RECOMMENDED CHANGES <i>(Exact wording of suggested change)</i>	Priority	HOW COMMENT WAS INCORPORATED <i>(If not incorporated, why?)</i>
<del>129</del>	6.7	II	27		Insert “sustainable practices” into the text, full text with insert reads: “Provide education on how sustainable practices and lifestyle changes can help reduce our carbon footprint. Examples could include things to do at home, products to buy or avoid, as well as area-specific actions, such as taking the local bus or using the bike paths.”		Changed language to add “ sustainable practices”
<del>130</del>	6-7	IV	50-53		Consider creating an interpretive video or story of the CVBMP planning process, including how a collaborative effort brought together diverse interests to plan and develop the Bayfront in a manner where the Harbor, Otay, and Sweetwater Districts coexist for the long-term sustainability of local and regional wildlife.		No change Same as existing language
<del>131</del>	6.8	IV	6		Insert “sustainability” into the second sentence of the text, full text with insert reads: “Emphasize how good planning principles can help achieve multiple perceived competing goals. Provide a model of sustainability, conservation, and development for others to follow.”		Changed language to add “ sustainability”

South Bay WAG Consensus Comments MATRIX

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<del>132</del>	7-22	II	Needs line #s		<p>II. A and B should be III and IV as in all three things are required eventually and not subsets of II.</p> <p>B. Should be a separate commitment and should state that Predator management WILL be implemented as needed and as required by the controlling documents and as stated elsewhere in the document.</p> <p>The whole item should read:</p> <p><i>II. The Port/City shall assign personnel resources to implement the NRMP, at a minimum, equivalent to one full time (average 40 hours a week) employee whose duties will include, among others, Program coordination and management, designated to track and coordinate implementation of the NRMP.</i></p> <p><i>III. The Ranger/Docent responsibilities proposed for CVBMP education, outreach will be initiated as project-related revenues are identified in accordance with Section 3.4 of the Settlement Agreement.</i></p> <p><i>IV. Predator management, including management of natural and domestic predator control and trash management to avoid attracting predators will be implemented if and as needed.</i></p> <p><i>Comprehensive predator management will be contracted as is currently done by the Port with a qualified entity and/or agency. Private property owners will be required to grant property access as needed.</i></p> <p><i>V. The Port/City will dedicate staff resources as needed to apply for and secure grant funding for NRMP and restoration projects.</i></p>	High Priority Major Issue	<p><a href="#">Change language to add "II. The Port/City shall assign personnel resources to implement the NRMP, at a minimum equivalent to one full time (average 40 hours per week) employee whose duties will include, among other, Program coordination and management, designated to track and coordinate implementation of the NRMP."</a></p> <p><a href="#">Change language to delete "A." and add "III."</a></p> <p><a href="#">Change language to delete "B. Predator Management, such as feral cat control and trash management to avoid attracting predators, maybe implemented" and add "IV. Predator management, including management of natural and domestic predator control and trash management"</a></p>

South Bay WAG Consensus Comments MATRIX

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<a href="#">134</a>							<p><a href="#">Management to avoid attracting predators will be implemented if and as needed. Comprehensive predator management will be implemented as is currently done by the Port with a qualified entity and/or agency.</a></p> <p><a href="#">V. The Port/City will dedicate staff resources as needed to apply for and secure grant funding for NRMP and restoration projects to meet the obligations in the controlling documents and to support qualifying projects.”</a></p>

South Bay WAG Consensus Comments MATRIX

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133	Various related to monitoring				<p>Overall Comment. The document contains a number of general statements about monitoring. For example, 1.4.5 states,  <i>"Pilot projects should be supported by monitoring in an adaptive framework, designed to determine whether project outcomes are benefiting the NRMP's goals and objectives, and whether they are achieved efficiently and equitably. Monitoring will benefit accountability among partners in NRMP implementation."</i></p> <p>The WAG recognizes the value in monitoring efforts to inform management decisions. Given the number of strategies and scope of this project, clearly identifying the objectives, data needs, sampling design (and statistical approach if applicable), trade-offs, etc. will be crucial to ensure the resources dedicated to monitoring are used wisely. Chapter 7 includes useful information, including identifying existing, relevant data sets, to assist in accomplishing this goal. But additional planning will still be needed to ensure monitoring efforts achieve the desired outcome.</p>		Comment noted

South Bay WAG Consensus Comments MATRIX

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<del>134</del>	7-10			7-1, 7-2	<p>Table 7-1 and 7-2 should be green line with the following language added:  <i>Within 18 months of the adoption of the NRMP (or prior to the first CO issued for any project whichever comes first) the Port/City will contract with a qualified contractor to develop an implementation monitoring plan for Table 7-1 and 7-2 to specify how monitoring, reporting, and evaluation will occur, to be used to determine the need for future potential actions. The follow-on study also needs to identify the variables to be used to identify and quantify ecosystem services and address issue raised in comment 18 of this matrix..</i></p>	High Priority Major Issue	<p>Change language to add <a href="#">a green line and</a> “A key component of the Natural Resources Management Plan, is that it utilizes an adaptive approach to management of resources. As such, the long-term monitoring that guides management actions must be targeted to identify impacts, if any, that are a result of the development and must also be adaptive in structure. Therefore, the long-term monitoring program should be focused on identifying and monitoring metrics associated with linkages between the development and the adjacent natural resources within buffers, restored habitat and WHA’s. Adaptive management would then utilize monitoring results to promote beneficial linkages and</p>



South Bay WAG Consensus Comments MATRIX

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135							<p>to minimize or eliminate negative linkages. Therefore, a monitoring plan shall be developed which focuses on encroachment of invasive species; human activity in buffers and WHA's; nuisance animals; and the effectiveness of human use of bay front; trash collection; building construction; landscaping and stormwater treatment facilities.</p> <p><u>Sixty (60) days following the signing of an option to lease or similar document for development in the Sweetwater (including the park) or Otay Districts or the development on H-3, H-23, H-13 or H-14 whichever is first, the Port/City will contract with a qualified contractor or use other comparable resources to develop a draft monitoring plan, including baseline conditions for entire bayfront, identify data gaps, and implementation schedule based on the</u></p>

South Bay WAG Consensus Comments MATRIX

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<a href="#">138</a>							<a href="#">conditions</a> for entire bayfront, identify data gaps, and <a href="#">implementation schedule based on the information in Tables 7-1 and monitoring of the status of the natural resources and natural resource indicators included in 7-2. The plan will be adopted, including a monitoring framework for the entire Bayfront and will be implemented at the onset of site alteration of the project triggering the development of the plan.”</a>
<del>136</del>					The above activities should list the funding source as JPA O&M.	Important	Change language to add “funding source as JPA O&M”
<del>137</del>	7-13		10-11		<p>Spotted sand bass and yellowfin croaker are important living marine resources, and NOAA/NMFS has broad authority for protecting these types of resources (e.g., under the Fish and Wildlife Coordination Act). However, as we interpret the term, “NOAA managed fishery resources”, these two species do not qualify as such since they are not managed under a Federal Fishery Management Plan. Therefore, we recommend identifying them as “NOAA trust resources” instead.</p> <p>Just fyi, California scorpionfish is a federally managed fishery resource as it’s covered under the Pacific Coast Groundfish Fishery Management Plan.</p>		Change language to deleted “managed fishery resources” and add “trust resources”

## South Bay WAG Consensus Comments MATRIX

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<del>138</del>	7-12			Table 7-2	NMFS supports the eelgrass extent indicator and use of the baywide eelgrass surveys. The NRMP should reflect that interpretation of the trend assessment language, which notes the current extent will be compared to the maximum extent. As long as this comparison with the maximum extent is used solely to identify a positive or negative trend (e.g., 85% of maximum this year, 78% of maximum last year), and a given year's results are not expected to meet or exceed the maximum extent, this should be fine. We just don't want to establish an indicator in which results that are within the normal range of eelgrass habitat fluctuations are interpreted as failing to meet the identified target.		Comment noted
<del>139</del>	7-25	II			Eelgrass is also highly effective at carbon sequestration and should be noted here in addition to salt marsh habitat.		Change language to add "eelgrass and"
<del>140</del>	Appdx A				Move Appendix A to page ii, after TOC.		Change Move Appendix A after the Table of Contents
<del>141</del>	New Appdx letter				Give implementation table its own appendix letter.		Change Implementation Table to be own Appendix
<del>142</del>	C-6		9-25		Green sea turtles should be included in the list of "Important Species and Habitats" in section C.2.1. Please consider incorporating the following language: <i>"San Diego Bay serves as important habitat for a resident population of up to approximately 60 juvenile and adult ESA-listed green sea turtles (Eguchi et al. 2010)."</i> Reference information: Eguchi, T., J.A. Seminoff, R.A. LeRoux, P.H. Dutton, D.L. Dutton. 2010. Abundance and survival rates of green turtles in an urban environment: coexistence of humans and an endangered species. Marine Biology 157:1869-1877.		Change language to add "San Diego Bay serves as important habitat for a resident population of up to approximately 60 juvenile and adult ESA-listed green sea turtles (Eguchi et al. 2010)."

South Bay WAG Consensus Comments MATRIX

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<del>143</del>	App D, Page D-2	D.1.1	14-16		The referenced San Diego Bay Sea Level Rise Adaptation Strategy document presented SLR projections for the Bay and flooding maps for portions of the Bay – include those in this document and replace them when new maps become available. Also, this document should consider including mapping of SLR (under low and high emission scenarios) from the Climate Central Surging Seas report ( <a href="http://www.climatecentral.org">www.climatecentral.org</a> ).		Change language to add “The Port/City will utilize as appropriate the California Coastal Commission’s Sea Level Rise Guidance document”																				
<del>144</del>	Appendix D, page D-1	D.1.1	27		This appendix on sea level rise should cite and rely on SLR projections (42-167 cm by 2100) provided by the National Research Council (2012) and included in the CA Coastal Commission’s Sea Level Rise Policy Guidance document (2015). The SLR Policy Guidance document uses the most current/updated and widely accepted SLR projections presently available; all Port of San Diego planning documents and specific projects (including this NRMP) should comport with the state’s document.		Change language to add “The Port/City will utilize as appropriate the California Coastal Commission’s Sea Level Rise <a href="#">Policy</a> Guidance document”																				
<a href="#">148</a>	<a href="#">Appendix D, page D-3</a>	<a href="#">D.1.1</a>			<a href="#">Insert maps of current elevations for the Bayfront</a>		<a href="#">Change language to add existing elevation maps for the Bayfront.</a>																				
<a href="#">149</a>	<a href="#">Appendix D,</a>	<a href="#">D.1.1</a>			<table border="1"> <thead> <tr> <th data-bbox="686 917 1031 943"><a href="#">National Research Council (NRC 2012)</a></th> <th data-bbox="1031 917 1230 943"></th> <th data-bbox="1230 917 1430 943"></th> <th data-bbox="1430 917 1675 943"></th> </tr> <tr> <td data-bbox="686 943 1031 979"><a href="#">-</a></td> <td data-bbox="1031 943 1230 979"><a href="#">2030</a></td> <td data-bbox="1230 943 1430 979"><a href="#">2050</a></td> <td data-bbox="1430 943 1675 979"><a href="#">2100</a></td> </tr> <tr> <td data-bbox="686 979 1031 1015"><a href="#">Low end of range</a></td> <td data-bbox="1031 979 1230 1015"><a href="#">2 in.</a></td> <td data-bbox="1230 979 1430 1015"><a href="#">5 in.</a></td> <td data-bbox="1430 979 1675 1015"><a href="#">17 in. (1.4 ft)</a></td> </tr> <tr> <td data-bbox="686 1015 1031 1050"><a href="#">Mid-range</a></td> <td data-bbox="1031 1015 1230 1050"><a href="#">6 in.</a></td> <td data-bbox="1230 1015 1430 1050"><a href="#">11 in.</a></td> <td data-bbox="1430 1015 1675 1050"><a href="#">37 in. (3.1 ft)</a></td> </tr> <tr> <td data-bbox="686 1050 1031 1086"><a href="#">High end of range</a></td> <td data-bbox="1031 1050 1230 1086"><a href="#">12 in.</a></td> <td data-bbox="1230 1050 1430 1086"><a href="#">24 in.</a></td> <td data-bbox="1430 1050 1675 1086"><a href="#">66 in. (5.5 ft)</a></td> </tr> </thead> </table>	<a href="#">National Research Council (NRC 2012)</a>				<a href="#">-</a>	<a href="#">2030</a>	<a href="#">2050</a>	<a href="#">2100</a>	<a href="#">Low end of range</a>	<a href="#">2 in.</a>	<a href="#">5 in.</a>	<a href="#">17 in. (1.4 ft)</a>	<a href="#">Mid-range</a>	<a href="#">6 in.</a>	<a href="#">11 in.</a>	<a href="#">37 in. (3.1 ft)</a>	<a href="#">High end of range</a>	<a href="#">12 in.</a>	<a href="#">24 in.</a>	<a href="#">66 in. (5.5 ft)</a>		<a href="#">Change language to add</a>
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