



March 12, 2014

Chair Bob Nelson and Port Commissioners  
San Diego Unified Port District  
3165 Pacific Highway  
San Diego, CA 92101

*Via Electronic Mail*

**RE: San Diego Environmental Coalition Members Comments on Guiding Principles for Inclusion into the Unified Port of San Diego's Vision Plan for San Diego Bay**

Dear Chair Nelson and Commissioners:

The signatory organizations have long-standing interest and participation in the protection and conservation of natural resources and ecological functions of San Diego Bay. We strongly recommend that the Unified Port of San Diego incorporate the following guiding principles in its Vision Plan for the next major update to the Port Master Plan.

**Background**

San Diego Bay has been greatly altered over the approximately 150 years since its development as a port began. Among the most significant alterations are shoreline armoring; filling of marsh, intertidal habitats; dredging of shallow water and deep water habitats; changes to the quantity and quality of freshwater inflows; industrial and urban development on the Bay's shoreline, bay sediment contamination, removal of sewage discharges into the Bay; and greatly increased naval and commercial ship traffic and recreational boating.

The Bay's evolving and current status as a mixed-use port has allowed it to retain significant, but very diminished, pieces of its original natural resources. In addition to historical changes, climate change – particularly sea level rise - is expected to have a substantial impact on both developments and natural resources in and around the Bay.

Our organizations believe that the Vision Plan must incorporate guiding principles that recognize the significant historical reductions of the Bay's natural resources, the projected effects from both future sea level rise and changes in development and infrastructure needs, and the need to conserve and enhance the Bay's natural resources.

## OVER-ARCHING PRINCIPLE

### 1. **Planning Issue:** Addressing and valuing San Diego Bay as a whole ecosystem.

Effective planning for San Diego Bay must address its physical and biological components and the physical and ecological processes that comprise the “whole bay” system and commit to conserve those features and processes. A comprehensive vision for the Bay should focus first on maintaining and enhancing Bay waters and water-dependent natural resources. However, key components of the Bay have been greatly altered (e.g., reductions in acreage of shallow subtidal, intertidal and marsh habitats; reductions in land-derived sediments). Much of that alteration occurred without considering the whole bay ecosystem or a comprehensive assessment of opportunities and constraints in balancing the conservation of its natural resources and its potential for development. Benefits of a healthy, functioning ecosystem both economically and for its ecosystems services and intrinsic values must be understood and embraced.

**Guiding Principle:** The Master Plan will comprehensively plan the Port's development and activities using a “whole bay” ecosystem approach. The Master Plan will include conservation and enhancement of ecosystem functions and values as primary objectives for all (new and re-) development projects and activities under the auspices of the Port and the Port will partner with other agencies to achieve this as well.

## OTHER KEY PRINCIPLES

### 2. **Planning Issue:** Planning must address climate change and sea level rise

The recent report, *Sea Level Rise Adaptation Strategy for San Diego Bay* (ICLEI and San Diego Foundation, 2012), identified key vulnerabilities from sea level rise including: increased flooding that the region already experiences due to waves, storm surge, El Nino events and very high tides; vulnerability to regularly occurring inundation of certain locations and assets - this longer-term risk of inundation should be a consideration in today's decision-making; and the most vulnerable sectors include stormwater management, wastewater collection, shoreline parks and public access, transportation facilities, commercial buildings, and ecosystems.

**Guiding Principle:** The Master Plan will use the best available science to identify and assess future threats to existing natural resources and development from sea-level rise and pro-actively identify areas where changed land uses should be considered; and develop adaptation strategies and development standards to minimize impacts to these resources or accommodate changes to the at-most-risk areas.

**Guiding Principle:** Prioritize areas throughout the Bay that can be conserved – now and in the future -to protect natural resources and designate them for habitat—the most important of these sites are preservation and restoration of Pond 20 and the marsh habitats on the Chula Vista

Bayfront. Encourage the use of “natural infrastructure” solutions (e.g. oyster reefs, horizontal levees, strategic managed shoreline retreat) where feasible to protect both natural areas and developments.

**3. Planning Issue:** Ecosystem services are inadequately assessed and under-valued.

Marine, estuarine and bay ecosystem services are seriously undervalued, resulting in under-investment in conservation and missed opportunities to link with sustainable economic growth. Economic valuation provides a powerful tool for implementing sustainable development by calculating economic benefits that the ecosystem provides and what would be lost if the ecosystem is not protected. Nationally, marine ecosystem services contribute significantly to the Gross Domestic Product (GDP).

**Guiding Principle:** The Master Plan will maximize ecosystem services. It will acknowledge the socioeconomic and ecological values that ecosystem services contribute to human welfare, both directly and indirectly. The plan will maintain and improve marine, estuarine and bay ecosystems to support sustainable uses as part of market based capital and incorporate natural capital as an important part of the decision making process.

**4. Planning issue:** Plans need to integrate with ecologically adjacent resources

The southern California coastal marine bioregion or the Southern California Bight, SCB, is considered one of the most threatened “hot spots” for biodiversity in the world. San Diego Bay is an important part of the SCB. Development or serious modifications to southern California’s coastal watersheds, bays and estuarine wetlands has resulted in a significant decline in ecological productivity of the marine bioregion. Institutional changes that support and complement large scale comprehensive bioregional planning will make it possible to protect, restore and sustainably utilize the ecological and economic integrity of the SCB.

**Guiding Principles:**

- a. Recognize and retain ecological relationships between habitat and biodiversity. Ensure that utilization, protection, enhancement and restoration are all interlinked and reflected in resource planning. It is the dynamic inter-relationship between and among these different habitats and ecological systems that support the productivity and stability of both ecological and economic systems.
- b. Recognize and retain the linkage between watersheds, bays, lagoons, estuaries and the ocean. There is a vital ecological connectivity between watersheds and the ocean. Watershed input can profoundly shape marine ecosystems. Healthy fisheries are dependent upon the inter-relationship between estuaries, bays and the ocean.
- c. Expand the involvement of a more formal program for including the research community in planning the future of the Bay. Science-based research should be integral to decisions regarding

activities that occur in the marine, estuarine, and bay. The Monterey Bay region is a good model for the Port of San Diego.

#### **5. Planning Issue:** Permitting efficiency for Bay projects

The Bay environment – its water, shoreline and connected uplands – is a treasured and sensitive resource, and a highly regulated one. The mixed uses that occur in the Bay, if planned appropriately, should complement and minimize impacts to each other. A plan that provides for predictable development, activities/uses, and conservation/enhancement of natural resources can be the basis for improving and streamlining the permitting process. A similar approach has been implemented in San Diego to reduce development and resource conservation conflicts and expedite permitting that can be a model for the Bay.

**Guiding Principle:** The Port of San Diego will endeavor to create a 50-year updated Master Plan that provides guidance for - and commitments to – develop its jurisdictional lands to balance coastal-marine development and conservation of natural resources and ecosystem functions so that both are sustainably managed into the future. The Master Plan Update will provide sufficient direction and commitments regarding development and operations and natural resources conservation (including restoration) such that regulatory agencies are able to issue streamlined permitting for future projects that conform to the plan's direction and commitments.

#### **6. Planning Issue:** Implementing the Existing Natural Resource and Conservation Plans with Partners

The Port of San Diego-US Navy's Integrated Natural Resources Management Plan (INRMP) is a comprehensive, long-term strategy to protect, enhance and steward the Bay's ecological functions and species while supporting the non-natural resource mission-related work of the Port and US Navy. It identifies natural resource needs and recommends specific projects for implementation that are consistent with the continuing missions of the Port and Navy. In addition, the San Diego Bay National Wildlife Refuge Comprehensive Conservation Plan (CCP) managed by the US Fish and Wildlife Service provides a 15-year management program for South San Diego Bay and Sweetwater Marsh Units. These plans provide the science-based conservation assessment of the Bay's environment and their implementation will support, maintain and enhance natural resources in the Bay.

**Guiding Principle:** The Port's Master Plan will be consistent with, incorporate (to the maximum extent feasible), and facilitate implementation of the INRMP and CCP as a primary means to maintain and enhance the Bay's ecosystem values.

- 7. Planning Issue:** Establish a Wild Green Web (Network) that links San Diego Bay's natural habitats together with other natural areas in the local bioregion.

The natural resources in San Diego Bay are part of, and dependent upon to a large degree, the larger network of lands and waters. Because much of the Bay and its surrounding have been greatly altered, it is critical that the remaining – and augmented – habitat areas be consistently managed. It will be necessary for the community, NGOs, interested parties to work with the Port of San Diego to promote this process.

**Guiding Principle:** The Port of San Diego will include and promote a 'Wild Green Web' that includes habitat areas throughout San Diego Bay. Interconnections among the identified natural areas will be maintained or created as part of the Wild Green Web. These areas also have to be planned and connected with the other major resources in the region, the Tijuana Estuary, Mission Bay, Famosa Slough, and the San Diego, Sweetwater, and Otay Rivers.

- 8. Planning issue:** Providing residents, visitors, and tourists with better opportunities for experiencing, enjoying, and learning from the Bay's natural environment.

San Diego Bay supports a diverse variety and number of wildlife that changes seasonally, providing a strong base for recreational and educational activities. However, the most productive and interesting habitats of the Bay - its saltmarshes and natural shorelines - are often poorly accessible for visitors. Many areas that are accessible have been converted to rock revetment, support very little of the Bay's wildlife, trap floating trash, and present very little that is of interest to visitors. Enhancing the shoreline to attract wildlife in areas, increasing appropriate visitor access, and adding interpretive features would provide residents, visitors, and tourists a richer and more memorable experience when visiting the Bay. Improve the visible wildlife along the Port's shoreline so the travelers will have a reason to stay in Port hotels and use Port restaurants.

**Guiding Principle:** The Master Plan will include a program to identify areas of the shoreline that presently or in the future could be enhanced and made more accessible to encourage greater visitation and use by people.

- 9. Planning issue:** Taking advantage of the ecotourism value of the Bay.


San Diego Bay supports a significant number of migratory birds in the winter, the time of the year in which our hotel occupancy is lowest. It is also the time of the year that people from the northern part of the US and from Canada would be happy to see many of these birds. An ecotourism study sponsored by the Coastal Conservancy pointed out that some business travelers would add extra days to their business travel, and are more likely to include family


members, which can increase ecotourism. With a new high-end hotel in Imperial Beach, marketing to a broader base of ecotourists will be increasingly successful.


**Guiding principle:** In conjunction with the cities around the Bay, the Port will develop and experiment with a marketing strategy to attract winter visitors who enjoy nature. Emphasize local wildlife attractions like Living Coast Discovery Center, Cabrillo National Monument, and Tijuana Estuary, and link this to other ecotourism efforts across the county.


Thank you for consideration of our comments.

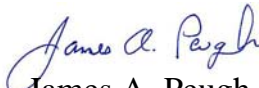
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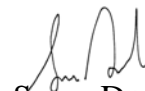
  
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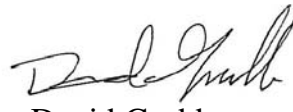
  
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