THE CITY OF SAN DIEGO

MITIGATED NEGATIVE DECLARATION

Project No. 231328
SCH No. 2014081073

SUBJECT: **Inn at Sunset Cliffs**: COASTAL DEVELOPMENT PERMIT (CDP) and a SITE DEVELOPMENT PERMIT (SDP) for the construction of a new 170-foot-long secant pile seawall. Additionally, the project would remove the following improvements: remnants of an existing seawall, approximately 2,120 square feet of a lower concrete deck and two (2) existing keystone block firepits. The original seawall was constructed in 1953 and has had multiple failures due to high tides which lead to the collapse of the concrete deck both in December 2015 and January 2019. All proposed work would occur on private property and within the footprint of the existing shoreline protection devices (seawall and lower deck). The subject property is 0.542 acres, of which the total disturbed area is less than 0.131 acres. There are no existing easements, and none are proposed. The project is located at 1370 Sunset Cliffs Boulevard in the RM-5-12 (Residential-Multiple Unit) Zone, Coastal Overlay Zone (Appealable), Designated Historic District: Ocean Beach Cottage Emerging District, Coastal Overlay Zone First Public Roadway, Coastal Height Limit Overlay Zone, Transit Priority Area, Parking Impact Overlay Zone (Coastal Impact/Beach Impact), Residential Tandem Parking Overlay Zone, Sensitive Coastal Overlay, ALUCP Airport Influence Area (AIA): San Diego International Airport - Review Area 2, Designated Medium Density Residential within the Ocean Beach Community Plan. (LEGAL DESCRIPTION: MAP 1889, BLOCK 27, LOT I, EXC SW 125 FT, APN 448-341-0100). APPLICANT: Inn at Sunset Cliffs- Gavin Fleming

See attached Initial Study.

II. ENVIRONMENTAL SETTING:

See attached Initial Study.

III. DETERMINATION:

The City of San Diego conducted an Initial Study which determined that the proposed project could have a significant environmental effect in the following areas(s): **Biological Resources**. Subsequent revisions in the project proposal create the specific mitigation identified in Section V of this Mitigated Negative Declaration. The project as revised now avoids or

mitigates the potentially significant environmental effects previously identified, and the preparation of an Environmental Impact Report will not be required.

IV. DOCUMENTATION:

The attached Initial Study documents the reasons to support the above Determination.

V. MITIGATION, MONITORING AND REPORTING PROGRAM:

A. GENERAL REQUIREMENTS

Plan Check Phase (prior to permit issuance)

1. Prior to Bid Opening/Bid Award or beginning any construction related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD) (plans, specification, details, etc.) to ensure the MMRP requirements have been incorporated. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, "ENVIRONMENTAL/MITIGATION REQUIREMENTS."
2. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website: http://www.sandiego.gov/developmentservices/industry/information/standtemp.shtml.
3. The TITLE INDEX SHEET must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.
4. SURETY AND COST RECOVERY. The DSD Director or City Manager may require appropriate surety instruments or bonds from private Permit. Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

Post Plan Check (After permit issuance/Prior to start of construction)

5. PRE-CONSTRUCTION MEETING is required ten (10) working days prior to beginning any work on this project. The Permit Holder/Owner is responsible to arrange and perform this meeting by contacting the City Resident Engineer (RE) of the Field Engineering Division and City staff from Mitigation Monitoring Coordination (MMC). Attendees must also include the Permit Holder's Representative(s), Job Site Superintendent, and the following consultants:
    - Qualified biologist
    - Qualified archaeologist and Native American monitor

Note: Failure of all responsible Permit Holder's representatives and consultants to attend shall require an additional meeting with all parties present.

CONTACT INFORMATION:

a. The primary point of contact is the RE at the Field Engineering Division – 858-627-3200.
b. For clarification of environmental requirements, applicant is also required to call RE and MMC at 858-627-3360.

6. MMRP COMPLIANCE. This Project, Project Tracking System (PTS) Number 658785 and/or Environmental Document Number 658785, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction

of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.

Note: Permit Holder's Representatives must alert RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by RE and MMC BEFORE the work is performed.

7. OTHER AGENCY REQUIREMENTS: Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency: ***None required*.**
8. MONITORING EXHIBITS: All consultants are required to submit to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the limit of work, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

Note: Surety and Cost Recovery- When deemed necessary by the DSD Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

9. OTHER SUBMITTALS AND INSPECTIONS: The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

DOCUMENT SUBMITTAL/INSPECTION CHECKLIST

Issue Area	**Document Submittal**	**Associated Inspection/ Approvals/Notes**
General	Consultant qualification letters	Prior to preconstruction meeting
General	Consultant construction monitoring exhibits	Prior to preconstruction meeting
Biological Resources	Monitoring reports	Following construction monitoring

B. SPECIFIC MMRP ISSUE AREA CONDITIONS REQUIREMENTS

BIO-1 Biological Resource Protection During Construction: Prior to Bid Opening/Bid Award or beginning any construction related activity on-site, the Environmental Designee shall verify that the following project requirements are shown on the construction plans:

Prior to Construction

- **Biologist Verification –** The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as

defined in the City of San Diego's Biological Guidelines (2012), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.

- **Preconstruction Meeting –** The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
- **Biological Documents –** The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.
- **Biological Construction Mitigation/Monitoring Exhibit –** The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the biological documents in C above. In addition, include: restoration/ revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City ADD/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. Prior to the issuance of grading permits, the BCME shall be approved by MMC and referenced in the construction documents.
- **Resource Delineation –** Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.
- **Education –** Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

During Construction

- **Monitoring –** All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record

(CSVR). The CSVR shall be emailed to MMC on the 1st day of monitoring, the 1st week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.

- **Subsequent Resource Identification –** The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state, or federal regulations have been determined and applied by the Qualified Biologist.

Post Construction Measures

- In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state, and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

BIO-2

An abalone survey shall be performed within all intertidal and subtidal areas within 5 meters of the proposed in-water work area (riprap removal area). The abalone survey shall be conducted within 7 days of the start of in-water work. The survey shall be considered valid for 30 days and therefore repeated if in-water work takes more than 30 days or is delayed. If abalone are identified, the Project will be delayed until NOAA Fisheries can be consulted and a plan to protect in place or abalone relocation can be performed.

VI. PUBLIC REVIEW DISTRIBUTION:

Draft copies or notice of this Negative Declaration were distributed to:

United States Government
U.S. Fish and Wildlife Service (23)
U.S. Army Corps of Engineers (26)
U.S. Environmental Protection Agency (19)
NOAA Fisheries West Coast Region
State of California
State Clearinghouse (46A)
California Coastal Commission (47)
City of San Diego
Mayor's Office (91)
Council member Jennifer Campbell District 2
Jeffrey Szymanski (MS 501)
Martha Blake (MS 501)
James Quinn (MS 501)
Phil Lizzi (MS 501)
Central Library Department (81 a)
Office of the City Attorney, Corrine Neuffer (59)
Other Individuals or Groups
Ocean Beach Planning Board (367)
Ocean Beach Town Council (367A)
Coastal Right Foundation Craig Sherman, Esq.
Friends of Sunset Cliffs
Barbara Houlton
Livia Borak Beaudin, Coastal Law Group
Sunset Cliffs Natural Park Council (388)
Sierra Club (165)
San Diego Audubon Society (167)
Mr. Jim Peugh (167A)
California Native Plant Society (170)

RESULTS OF PUBLIC REVIEW

VII. RESULTS OF PUBLIC REVIEW:

( ) No comments were received during the public input period.

( ) Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.

(J Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.

Copies of the draft Negative Declaration and any Initial Study material are available in the office of the Development Services Department for review, or for purchase at the cost of reproduction.

Jeffrey Szymanski
Senior Planner
Deve opment Services Department

October 14. 2021
Date of Draft Report

Date of Final Report

Analyst: Jeff Szymanski

Attachments: Initial Study Checklist
Figure 1- Regional Location Map
Figure 2- Site Plan

INITIAL STUDY CHECKLIST

1. Project title/Project number: Inn at Sunset Cliffs/231328

2. Lead agency name and address: City of San Diego, 1222 First Avenue, MS-501, San Diego, California 92101

3. Contact person and phone number: Jeff Szymanski / (619) 446-5324

4. Project location: 1370 Point Loma Boulevard San Diego CA, 92107

5. Project Applicant/Sponsor's name and address: Inn at Sunset Cliffs-Gavin Fleming, 1370 Point Loma Boulevard San Diego CA, 92107

6. General/Community Plan designation: Medium Density Residential

7. Zoning: RM-5-12 zone

8. Description of project (Describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation.):

   The project proposes a Coastal Development Permit (CDP) and a Site Development Permit (SDP) for the removal of the remnants of an existing seawall, removal of approximately 2,120 square feet of a lower concrete deck, removal of two (2) existing keystone block firepits, and construction of a new secant pile seawall immediately landward of the landward edge of the lower deck. The original seawall, constructed in 1953, has had multiple failures, leading to the destruction of approximately one-third of the concrete deck. All proposed work would occur on private property and within the footprint of the existing shoreline protection devices (seawall and lower deck). The subject property is 0.542 acres, with the total disturbed area less than 0.131 acres. There are no existing easements, and none are proposed.

   Generally, the project consists of the following:

   • Install temporary erosion control.

   • Empty and remove Sand-filled geotubes from previous repairs.

   • Demolish existing walls, concrete infills (and debris to be hauled offsite).

   • Drill piles, place forms, and install rebar.

   • Drill and place hydraugers.

   • Place concrete to form secant piles.

   • Apply architectural treatment to the wall face to match the surrounding bluffs for a natural aesthetic.

   • Place fill and durable surface landward of the wall to prevent overtopping waves from

undermining the proposed new wall.

• Remove previously placed I-TON riprap from the shoreline.

Prior to construction of the seawall, the contractor would first build an access road from the end of Point Loma Avenue to the lower deck area to access and drill the overlapping drilled piers to create the secant pile wall. The steel reinforcing for every other drilled pier would extend above the ground surface up to the final top-of-wall elevation of 27.7 feet. While the overlapping drilled piers would be filled up to the construction subgrade (which varies from about elevation 24.2 feet at the north end of the wall down to about elevation 20 feet at the lower deck, and then up to 27.7 feet at the extreme southeasterly edge of the wall above the construction subgrade), horizontal reinforcing would be added to the exposed vertical steel reinforcing, wood forms placed on both sides of the exposed portion of the secant pile wall, and then concrete placed to create the upper exposed portion of the wall. Tiebacks would be drilled, installed, grouted, and then locked off. The wall would be approximately 170 feet long and an architectural treatment would be used on the wall face to match the surrounding bluffs.

After the upper row of tiebacks is locked off, the lower deck and existing seawall would be incrementally removed. The contractor would use a small excavator with a breaker bar on the lower deck, along with a crane (parked at the Point Loma Avenue street-end) with a grapple to pick up broken pieces, then setting them directly into 10- yard dumps parked on Point Loma Avenue. Any large rocks may be drilled and broken with expanding grout to reduce the size to enable the grapple to pick up manageable sizes of rock and debris. All of the recently placed stone and rip rap would be individually picked with a grapple and hauled off-site.

The seaward demolition work of the lower deck and existing seawall would temporarily stop at an interim pad elevation of around +8 feet MSL to enable the installation of the lower row of tiebacks and hydraugers. The demolition work would then continue, removing all construction materials.

After the installation of the lower tiebacks and hydraugers, the area immediately seaward of the secant pile wall would then be excavated down to the variable elevation bedrock seafloor while still leaving the more seaward lower portion of the existing wall to provide construction-period storm protection to enable the architectural treatment along the seaward face of the wall, after which the remaining seaward portion of the original seawall would be removed down to the underlying bedrock. After removing all of the debris, additional hand cleaning would be conducted, essentially removing all debris from the bedrock sea floor, leaving some variable elevation for potential creation of tide pools.

9. Surrounding land uses and setting:

The site is surrounded by residential and commercial uses to the north, institutional use (church) to the east, residential use to the south with the ocean on the west.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

California Coastal Commission

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

No, see Section XVIII of the Initial Study.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Greenhouse Gas Emissions	☐	Public Services
☐	Agriculture and Forestry Resources	☐	Hazards & Hazardous Materials	☐	Recreation
☐	Air Quality	☐	Hydrology/Water Quality	☐	Transportation
☐	Biological Resources	☐	Land Use/Planning	☐	Tribal Cultural Resources
☐	Cultural Resources	☐	Mineral Resources	☐	Utilities/Service System
☐	Energy	☐	Noise	☐	Wildfire
☐	Geology/Soils	☐	Population/Housing	☐	Mandatory Findings Significance

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial evaluation:

☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ The proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but must analyze only the effects that remain to be addressed.

☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or (MITIGATED) NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or (MITIGATED) NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact answer should be explained where it is based on project specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis.)

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses", as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or (mitigated) negative declaration. *Section 15063(c)(3)(D).* In this case, a brief discussion should identify the following:

    a. Earlier Analysis Used. Identify and state where they are available for review.

    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated", describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

    a. The significance criteria or threshold, if any, used to evaluate each question; and

    b. The mitigation measure identified, if any, to reduce the impact to less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒

Per the City of San Diego CEQA Significance Determination Thresholds (City's Thresholds) projects that would block public views from designated open space areas, roads, or parks or significant visual landmarks and scenic vistas may result in a significant impact. The Ocean Beach Community Plan (OBCP) identifies a "view cone" to the Pacific Ocean at the terminus of Point Loma Boulevard, just north of the project site. The proposed seawall would be located downslope from the view cone and would not impede any viewing opportunities to the Pacific Ocean. Therefore, the project would not have an adverse effect on scenic vistas. No impact would occur.

b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐

In order to construct the secant wall, piles would be drilled and then filled with concrete. The piles would be drilled into the toe of the slope and would generally follow the outline of the bluff. The seawall would abut the bottom of the bluff edge while the upper portion of the seawall would require backfill to prevent erosion by overlapping wave action. An alteration to the bluff would occur; however, the exposed face of the seawall would be architecturally treated and painted to match surrounding bluffs. Impacts would be less than significant.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒

According to the City's Thresholds projects that severely contrast with the surrounding neighborhood character may result in a significant impact. To meet this threshold one or more of the following conditions must apply: the project would have to exceed the allowable height or bulk regulations and the height or bulk of the existing patterns of development in the vicinity of the project by a substantial margin; have an architectural style or use building materials in stark contrast to adjacent development where the adjacent development follows a single or common architectural theme (e.g., Gaslamp Quarter, Old Town); result in the physical loss, isolation or degradation of a community identification symbol or landmark (e.g., a stand of trees, coastal bluff, historical landmark) which is identified in the General Plan, applicable community plan or local coastal program; be located in a highly visible area (e.g., on a canyon edge, hilltop or adjacent to an interstate highway) and would strongly contrast with the surrounding development or natural topography through excessive height, bulk signage or architectural projections; and/or the project would have a cumulative effect by opening up a new area for development or changing the overall character of the area.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Seawalls have been constructed at several locations in Ocean Beach and in close proximity to the Inn at Sunset Cliffs Project. There are two previously permitted seawalls to the north of the project at the end of Bermuda Avenue (Avery Seawall and Davenport Seawall), and another seawall that has been approved but not constructed (Houlton's Seawall). The Houlton Seawall is directly to the north of the project on the north side of Point Loma Boulevard. The Inn's seawall proposes an architectural treatment and design that will be consistent with these previously approved seawalls and would not starkly contrast with the adjacent seawalls. The aesthetic appearance of the proposed seawall would be similar to neighboring seawalls. Further, the OBCP allows for coastal protective devices when protecting existing development, therefore, no impacts would occur.

d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Per the City's Thresholds, projects that would emit or reflect a significant amount of light and glare may have a significant impact. To meet this significance threshold, one of the following must apply:

a. The project would be moderate to large in scale, more than 50 percent of any single elevation of a building's exterior is built with a material with a light reflectivity greater than 30 percent (see LDC Section 142.07330(a)), and the project is adjacent to a major public roadway or public area.

b. The project would shed substantial light onto adjacent, light-sensitive property or land use, or would emit a substantial amount of ambient light into the nighttime sky. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and industrial uses, and natural areas.

The project does not propose any use of outdoor lighting or building materials with highly reflective properties, such as highly reflective glass or high-gloss surface colors. Therefore, the project would not create any new sources of light pollution that could contribute to skyglow, light trespass, or glare and adversely affect day or nighttime views in the area. No impact would occur.

II.	AGRICULTURAL AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. – Would the project:				
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. Unique farmland is land, other than prime farmland, that has combined conditions to produce sustained high quality and high yields of specialty crops. Farmland of Statewide Importance may include tracts of land that have been designated for agriculture by State law. In some areas that are not identified as having national or statewide importance, land is considered to be Farmland of Local Importance. The Farmland Mapping and Monitoring Program (FMMP) maintained by the California Department of Conservation (CDC) is the responsible state agency for overseeing the farmland classification. In addition, the City's Thresholds state that in relation to converting designated farmland, a determination of substantial amount cannot be based on any one numerical criterion (i.e., one acre), but rather on the economic viability of the area proposed to be converted. Another factor to be considered is the location of the area proposed for conversion. The project site is not classified as farmland by the California Department of Conservation's FMMP. No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance occurs on site or within the area immediately surrounding the project site. Therefore, the project would not result in impacts related to the conversion of farmland to a non-agricultural use. No impact would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒

The Williamson Act, also known as the California Land Conservation Act of 1965, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use; in return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value. The Williamson Act is only applicable to parcels within an established agricultural preserve consisting of at least 20 acres of Prime Farmland, or at least 40 acres of land not designated as Prime Farmland. The Williamson Act is designed to prevent the premature and unnecessary conversion of open space lands and agricultural areas to urban uses.

As stated in response II (a) above. The proposed project site is not zoned for agricultural use. There are no Williamson Act Contract lands on or within the vicinity of the project. The project would not affect properties zoned for agricultural use or conflict with a Williamson Act Contract. No impact would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒

The project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned for Timberland Production. The project site is zoned for residential use; no designated forest land or timberland occurs within the boundaries of the project. No impact would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

Refer to response II (c) above. The project would not convert forest land to non-forest use. No impact would occur.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Refer to responses II (a) and II (c) above. No existing farmland or forest land are located in the proximity of the project site. No changes to any such lands would result from project implementation. No impact would occur.

III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on to make the following determinations – Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

According to the City's Thresholds, a project may have a significant air quality impact if it could conflict with or obstruct implementation of the applicable air quality plan. The San Diego Air Pollution Control District (SDAPCD) and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the San Diego Air Basin (SDAB). The County Regional Air Quality Strategy (RAQS) was initially adopted in 1991 and is updated on a triennial basis (most recently in 2016). The RAQS outlines the SDAPCD's plans and control measures designed to attain the state air quality standards for ozone (03). The RAQS relies on information from the California Air Resources Board (CARB) and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County and the cities in the county, to project future emissions and then determine the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the county as part of the development of their general plans.

As such, projects that propose development that is consistent with the growth anticipated by local plans would be consistent with the RAQS. However, if a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might conflict with the RAQS and may contribute to a potentially significant cumulative impact on air quality.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The proposed seawall is allowed by the City's Municipal Code and OBCP and would be consistent at a sub-regional level with the underlying growth forecasts in the RAQs and would not obstruct implementation of the RAQs. As such impacts would be less than significant.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐

The City's Thresholds state that a significant impact may occur if a project violates any air quality standard or contribute substantially to an existing or projected air quality violation.

Short-term Emissions (Construction)

Project construction activities would potentially generate combustion emissions from on-site heavy-duty construction vehicles and motor vehicles transporting the construction crew and necessary construction materials. Exhaust emissions generated by construction activities would generally result from the use of typical construction. Variables that factor into the total construction emissions potentially generated include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on or off site. It is anticipated that construction equipment would be used on site for four to eight hours a day; however, construction would be short-term and impacts to neighboring uses would be minimal and temporary.

Fugitive dust emissions are generally associated with land clearing and grading operations. Construction operations are subject to the requirements established in Regulation 4, Rules 52, 54, and 55 of the SDAPCD rules and regulations. The project would include standard measures as required by the City grading permit to minimize fugitive dust and air pollutant emissions during the temporary construction period. Therefore, impacts associated with fugitive dust are considered less than significant and would not violate an air quality standard or contribute substantially to an existing or projected air quality violation. Impacts related to short-term emissions would be less than significant.

Long-term Emissions (Operational)

Long-term air pollutant emission impacts are those associated with stationary sources and mobile sources related to any change caused by a project. Once constructed the project would not generate any new trips (beyond construction) or project-related emissions. Therefore, long-term operation of the project would not result in additional air emissions compared to existing conditions, and long-term operational emissions would not violate any relevant federal, state, or regional air quality standards for the SDAB.

Overall, the project is not expected to generate substantial short- or long-term emissions that would violate any air quality standard or contribute to an existing or projected air quality violation: therefore, impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒

The project is for the construction of a seawall and once in operation there would be no use of a substantial amount of pollutants. No impacts would occur.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☐

The City's Thresholds state that for a project proposing placement of sensitive receptors near an existing odor source, a significant odor impact will be identified if the project site is closer to the odor source than any existing sensitive receptor where there has been more than one confirmed or three confirmed complaints per year (averaged over a three- week period) about the odor source. Moreover, for projects proposing placement of sensitive receptors near a source of odors where there are currently no nearby existing receptors, the determination of significance should be based on the distance and frequency at which odor complaints from the public have occurred in the vicinity of a similar odor source at another location. The project is for the construction of a seawall and none of the above applies to the proposed project. No impacts would occur.

IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐

The City's Thresholds state that significance of impacts to biological resources are assessed by City staff through the CEQA review process and through review of the project's consistency with the Environmentally Sensitive Lands (ESL) regulations, the Biology Guidelines (2018) and with the City's MSCP Subarea Plan (1997).

A biological review of the project site was first conducted in October 2011 (Project Design Consultants 2011). Since that time City staff has verified the conditions of the project site and no change has been identified. The upper portion of the project is composed largely of hardscape and ornamental landscaping. The slope between the top tier patio and the collapsed deck is covered by ornamental ice plant. No native species were observed on the sloped area. The project site is developed, and no changes to the existing condition relative to biological resources have occurred since the time of the initial review. No impact would occur.

In addition, an Intertidal Biological Assessment (Marine Taxonomic Services, September 2021) was also conducted. MTS biologists conducted a marine biological survey at the Inn at Sunset Cliffs on December 23, 2019 between the hours of 1000 and 1400 during a period of low tides (2.0 feet mean lower low water (MLLW) at 1030 and -0.75 feet MLLW at 1400). The 0' MLLW boundary and the toe of

the riprap revetment at the foot of the vertical seawall were mapped utilizing a differential global positioning device (dGPS). Rocky reef habitat identified below the toe of the riprap revetment, along with the shoreward extent of marine algal growth was also surveyed.

The report determined that the proposed project would have no significant impact on surveyed rocky reef habitats adjacent to the toe of the riprap revetment, the riprap revetment itself, or the existing vertical seawall. Although the rocky reef habitats surveyed were found to support a diverse assemblage of marine species, no rocky reefs would occur within areas where construction activity would occur. Furthermore, the existing rock riprap revetment surveyed was not found to support a unique intertidal community. Because the proposed secant pile wall would be installed behind the existing vertical seawall, none of the marine algae or invertebrates surveyed on both the seawall and inside of the small opening within the seawall would be impacted during installation. Moreover, the demolition of the cast in place wall and block wall in front of the secant pile wall will not impact sessile intertidal communities because those features are above the high tide line. Turbidity impacts would not occur as a result of the installation of the proposed secant pile wall as all drilling would be contained behind the existing cast-in-place concrete wall.

While no sea turtles or marine mammals were observed by MTS biologists during the intertidal biological survey, sea lions and harbor seals are very common throughout San Diego, and no barriers currently exist that would prevent them from utilizing the Project area. Significant impacts could occur to any sea lion, harbor seal, or sea turtle if those species were to occupy the Project area during construction. Any Project actions that result in modification of behavior would be considered Level B harassment of these sensitive species. Injury could result if riprap or other materials were dislodged and allowed to fall toward any of these sensitive species; this would represent Level A harassment (injury or death). These impacts would be considered significant.

However, impacts to sea lion, harbor seal, and green sea turtle can be mitigated through monitoring regardless of the potential. During in-water construction activities such as the removal of riprap, a marine biological observer shall be on site to monitor construction activities. The observer shall have the authority to halt or modify construction activities in the event any sensitive species is observed and if the marine biological observer feels the activity has the potential to harm the sensitive species. Note that the previous draft of this report indicated a potential need for marine mammal monitoring due to the potential to produce noises that could disturb marine mammals. After consultation with the engineer relative to construction means and methods, it is the opinion of MTS that the potential for noise impacts to marine mammals because of landside drilling is less than significant.

Additionally, removal of the riprap may result in injury or death of any abalone species that occurs on the riprap or any adjacent surface where riprap could fall during removal. Although abalone were not observed during this survey, the Project area does contain suitable abalone habitat and abalone could colonize the Project area prior to construction. Any impact to abalone species would be considered significant. To avoid impact, the following mitigation measure is proposed. An abalone survey shall be performed within all intertidal and subtidal areas within 5 meters of the proposed in-water work area (riprap removal area). The abalone survey shall be conducted within 7 days of the start of in-water work. The survey shall be considered valid for 30 days and therefore repeated if in-water work takes more than 30 days or is delayed. If abalone are identified, the Project will be

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

delayed until NOAA Fisheries can be consulted and a plan to protect in place or abalone relocation can be performed.

These mitigation requirements shall be incorporated into Section V of the MMRP and would reduce potential impacts to biological resources to below a level of significance. Therefore, the project would not have substantial effects on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒

No federally, state, or locally protected wetlands, including marsh, vernal pools, or coastal wetlands, are present on the project site. The project is adjacent to the Pacific Ocean but the construction of the seawall would not result in impacts. Therefore, the project would not result in impacts to wetlands.

c) Have a substantial adverse effect on federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒

See IV. b), the project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. No impacts would occur.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒

Due to the project location on a developed site with no native vegetation, project implementation would not interfere with the movement of any native resident or migratory fish or wildlife species, with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, as none exist within the project area.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The project would not conflict with any local, regional, or state habitat conservation plans because the project site also does not contain any sensitive habitat or is within the Multi-Habitat Planning Area within the City's Multiple Species Conservation Plan. The project is consistent with the City's Biology Guidelines (2018) and ESL Regulations; no conflict with local policies or ordinances protecting biological resources would occur.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Please see response IV(a) above. The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impacts would occur.

V. CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5?	☐	☐	☐	☒

The purpose and intent of the Historical Resources Regulations of the Land Development Code (Chapter 14, Article 3, and Division 2) is to protect, preserve and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises. Before approving discretionary projects, CEQA requires the Lead Agency to identify and examine the significant adverse environmental effects which may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (sections 15064.5(b) and 21084.1). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities, which would impair historical significance (sections 15064.5(b)(1)). Any historical resource listed in, or eligible to be listed in the California Register of Historical Resources, including archaeological resources, is considered to be historically or culturally significant.

Archaeological Resources

The project site has been previously disturbed by development of the existing motel and seawall. Ground-disturbing activities would be limited to installation of the secant pile walls into formational soil that lacks cultural material. Qualified City staff did prepare a record search of the California Historic Resources Information System (CHRIS) digital database to determine the presence or absence of potential resources within the project site. The record search was negative. Based upon the negative CHRIS search and the previously disturbed nature of the site, qualified staff was able to conclude that the project would not result in significant impacts to cultural resources. Similarly, there would be no potential for inadvertent discovery of Native American or other human remains. Therefore, impacts to cultural resources would be less than significant.

Built Environment

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The remnants of the seawall and collapsed patio lack integrity and are not historical resources as defined by CEQA Section 15064.5. The removal of debris associated with these features and subsequent construction of the proposed seawall, therefore, would not cause a substantial adverse change to the significance of an historical resource. No impact would occur.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒

Please see V. a), impacts to archaeological resources would not occur.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☐	☒

Based upon response V. a) there would be no potential for the inadvertent discovery of Native American or other human remains.

VI. ENERGY – Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

Once constructed the seawall would not expend or consume energy. Based upon Title 24 requirements the construction of the seawall would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

The proposed project is consistent with the General Plan and Community Plan land use designations and is required to comply with Title 24. Therefore, the project would not conflict or obstruct renewable or efficiency plans. No impacts would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒

The site is not located in an Earthquake Fault Zone defined by the State Geologist and is not located within a fault zone identified on the City of San Diego Geologic Hazards and Fault Maps. The project's geotechnical consultant, TerraCosta Consulting Group, Inc., in their report of December 2020, indicated they reviewed available information and opined that the potential for ground rupture to be very low. No impact would occur.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

The site is in a seismically active area prone to strong seismic ground shaking from occasional earthquakes in the region. The proposed project will be required to implement the seismic design provisions of the California Building Code and potential impacts due to earthquake ground shaking will be reduced to an acceptable level of risk. Impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒

TerraCosta Consulting Group, Inc., the project's geotechnical consultant, has investigated the site conditions and in their report of December 2020 opined that the potential for liquefaction of subsurface soils at the site is negligible. No impact would occur

iv) Landslides?	☐	☐	☐	☒

A stability analysis of the natural geologic slopes (without the protective seawall and backfill) was completed for the site by TerraCosta Consulting Group, Inc. The analysis from the geotechnical report indicated that the slope has factors of safety ranging from 1.4 against a shallow failure within the terrace deposits, to a high of 4.0 against a deep-seated failure for gross stability. The construction of the seawall would not negatively impact the slope stability and as noted in the report would improve conditions. No impact would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒

Marine erosion threatens the coastal site and has been the chief cause of partial collapse of the lower deck and seawall. TerraCosta Consulting Group, Inc., indicates “even with a relatively high factor of safety against slope instability, in the absence of the seawall, the bluff-top improvements (including the two buildings) are at risk of damage from coastal erosion, with the southerly building at imminent risk (absent the seawall), with a reasonable probability of storm-induced damage occurring within the next two years.” According to TerraCosta Consulting Group, Inc., December 2020: “The proposed shoreline stabilization projects, is necessary to prevent continued erosion of the lower bluff threatening the bluff-top structures and to prevent flanking of the adjacent walls to the north and south.” The seawall project is chiefly to prevent impacts from marine erosion. No impact would occur.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒

A stability analysis of the natural geologic slopes (without the protective seawall and backfill) was completed for the site by TerraCosta Consulting Group, Inc. The geotechnical report indicates that the slope has factors of safety ranging from 1.4 against a shallow failure within the terrace deposits, to a high of 4.0 against a deep-seated failure for gross stability. The construction of the seawall would not negatively impact the slope stability and as noted in the report would improve conditions. No impact would occur.

As indicated above, TerraCosta Consulting Group, Inc., has investigated the site conditions and in their report of December 2020 opined that the potential for liquefaction of subsurface soils at the site is negligible. The potential for lateral spreading or collapse is related to potential for liquefaction. No impact would occur.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒

The geotechnical investigation of the site did not identify expansive soils as a potential hazard for the site. No impact is would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

The proposed project does not propose the use of septic tanks or alternative water disposal systems. No impacts would occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

In areas of high sensitivity for paleontological resources grading in excess of 1,000 cubic yards of soil and 10 feet would result in significant impacts to paleontological resources. In order to construct the seawall, the project proposes to grade approximately 0.012 acres, with a cut quantity of .20 cubic yards. The grading amount does not exceed the City's thresholds and impacts to paleontological resources would not occur.

VIII. GREENHOUSE GAS EMISSIONS – Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

In December 2015, the City adopted a Climate Action Plan (CAP) that outlines the actions that City will undertake to achieve its proportional share of State greenhouse gas (GHG) emission reductions. The purpose of the Climate Action Plan Consistency Checklist (Checklist) is to, in conjunction with the CAP, provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to the California Environmental Quality Act (CEQA).

Analysis of GHG emissions and potential climate change impacts from new development is required under CEQA. The CAP is a plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP.

This Checklist is part of the CAP and contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. Implementation of these measures would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. Projects that are consistent with the CAP as determined through the use of this Checklist may rely on the CAP for the cumulative impact analysis of GHG emissions. Projects that are not consistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

in this Checklist to the extent feasible. Cumulative GHG impacts would be significant for any project that is not consistent with the CAP.

The proposed project would not result in new occupancy buildings from which GHG emissions reductions could be achieved and therefore is not required to complete Step 2 of the Checklist per footnote 5. Therefore, since the project is consistent with Step 1 of the Climate Action Plan (CAP) Consistency Checklist, the proposed project would have less-than-significant GHG impacts.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Please see VII. a), based upon the CAP Checklist the project would not conflict with plans that would reduce greenhouse gases.

IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

a) Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒

The project site was not listed in any of the databases for hazardous materials including being listed in the State Water Resources Control Board GeoTracker system, which includes leaking underground fuel tank sites inclusive of spills, leaks, investigations, and cleanups and the Department of Toxic Substances Control EnviroStor Data Management System, which includes CORTESE sites.

Construction activities for the project would involve the use of potentially hazardous materials including vehicle fuels, oils, transmission fluids, paint, adhesives, surface coatings and other finishing materials, and cleaning solvents. However, the use of these hazardous materials would be temporary, and all potentially hazardous materials would be stored, used, and disposed of in accordance with manufacturers' specifications, applicable federal, state, and local health and safety regulations. As such, impacts associated with the transport, use, or disposal of hazardous materials would not be significant. No impacts would occur.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒

Refer to response Vlll (a) above.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within	☐	☐	☐	☒

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
one-quarter mile of an existing or proposed school?				

Please see VIII b), the project would not emit hazardous materials. No impact would result.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

A hazardous waste site records search was completed using Geotracker https://geotracker.waterboards.ca.gov/ The records search showed that no hazardous waste sites exist onsite or in the surrounding area. No impacts would occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two mile of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒

The proposed project is located within the AA Part 77 Noticing Area (Lindbergh and NAS North Island NAS. However, the construction of the seawall is downslope from street grade and would not result in a safety hazard or excessive noise. No impacts would occur.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

The project would construct a seawall and would not impair implementation or physically interfere with an adopted emergency response plan or emergency evacuation plan. No impacts would occur.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

The project is adjacent to the Pacific Ocean and there are no wildlands in the vicinity of the project. The construction of the seawall would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. No impact would occur.

X. HYDROLOGY AND WATER QUALITY - Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The project would comply with all storm water quality standards during and after construction, and appropriate Best Management Practices (BMP's) will be utilized and provided for on-site. Implementation of theses BMP's would preclude any violations of existing standards and discharge regulations. This will be addressed through the project's Conditions of Approval; therefore, impacts would be less than significant, and no mitigation measures are required.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒

The project does not require the construction of wells. The project would construct a seawall and remove prior construction debris. The project may generate an incremental use of water during construction but would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. No impact would occur.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☐	☒

See VII b), impacts would not occur.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☐	☒

Please see response X. c) i). No impact would occur.

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The project would not introduce any new conditions that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. No impact would occur.

iv) impede or redirect flood flows?	☐	☐	☐	☒

The construction of the seawall does not have the ability to impede or redirect flows that would result in an impact. Impacts would not occur.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒

The project does not propose the active use of pollutants, impacts would not occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

The project would comply with all storm water quality standards during and after construction, and appropriate BMPs will be utilized and provided for on-site. Implementation of theses BMP's would preclude any violations of existing standards and discharge regulations. The Implementation of these BMPs will be addressed through the project's Conditions of Approval; therefore, impacts would not occur.

XI. LAND USE AND PLANNING – Would the project:

a) Physically divide an established community?	☐	☐	☐	☒

The project does not propose the introduction of new structures or infrastructure, such as major roadways, water supply systems, or utilities to the area. Therefore, the project would not significantly disrupt or divide the established community. No impact would occur.

b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

The project would be consistent with the City of San Diego General Plan (2008) and Ocean Beach Community Plan/Local Coastal Program (LCP) (adopted July 2014) land use designations and City Municipal Code., The site is zoned RM-5-12, which permits visitor accommodations or medium-

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

density multiple dwelling units at a maximum density of 1 dwelling unit for each 1,000 square feet of lot area. The Inn at Sunset Cliffs is allowed by right in an RM-5-12 zone, along with accessory uses permitted in conjunction with hotels as defined by the Land Development Code (LDC). However, due the project's location a Coastal Development Permit, is required by LDC Section 126.0702(a) and is appealable to the California Coastal Commission.

Recommendation 7.3.4 from the Community Plan, allows for the placement of shoreline protective devices, such as concrete seawalls, and revetments, only when required to serve coastal-dependent uses or when there is no other feasible means to protect existing principal structures, such as homes, in danger from erosion. The geotechnical report has indicated that the proposed shoreline stabilization project is necessary to prevent the continued erosion of the lower bluff threatening the bluff-top structures and to prevent flanking of the adjacent walls to the north and south.

Additionally, the community plan recommendation also states that all coastal protective devices should be designed to blend with the surrounding shoreline and provide lateral public access. The project would apply architectural treatments to the wall face to match the surrounding bluffs but is not proposing public beach access. The project is inconsistent with this community plan recommendation. As mentioned in the City's Thresholds, Land Use impacts would occur only when there is a secondary physical environmental impact associated with a potential conflict with a land use plan. The lack of access does not have a negative impact on the physical environment. No impacts would occur.

XII. MINERAL RESOURCES – Would the project:

a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

The area surrounding the project site is not being used for the recovery of mineral resources and is not designated for the recovery of mineral resources on the City of San Diego General Plan Land Use Map. Therefore, the project would not result in the loss of availability of a known mineral resource. No impact would occur.

b)	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

See XII. a), no impacts would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐

The City's Thresholds identify that a significant impact would occur if:
Traffic generated noise impacts could result in noise levels that exceed a 45 weighted decibel (dbA) Community Noise Equivalent Level (CNEL) interior of 65 dbA CNEL exterior for single- and multi-family land uses, 75 dbA exterior for office, churches, and professional uses, and 75 dbA exterior for commercial land uses.

- A project which would generate noise levels at the property line which exceed the City's Noise Ordinance Standards is also considered a potentially significant impact. Additionally, Temporary construction noise which exceeds 75 dB (A) L_{EQ} at a sensitive receptor would be considered significant.

- Temporary construction noise which exceeds 75 dB (A) Leq at a sensitive receptor. Construction noise levels measured at or beyond the property lines of any property zoned residential shall not exceed an average sound level greater than 75-decibles (dB) during the 12-hour period from 7:00 a.m. to 7:00 p.m. In addition, construction activity is prohibited between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, that would create disturbing, excessive, or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator, in conformance with San Diego Municipal Code Section 59.5.0404.
- If noise levels during the breeding season for the California gnatcatcher, least Bell's vireo, southern willow flycatcher, least tern, cactus wren, tricolored blackbird or western snowy plover would exceed 60dB(A) or existing ambient noise level if above 60dB(A).

There would be no permanent operational noise source associated with the project and would not result in a permanent substantial increase to the existing noise environment. Therefore, the project noise would not exceed noise level limits established in the Noise Element of the General Plan or Section 59.5.0401 of the City's Noise Abatement and Control Ordinance. There would be no operational impact.

Construction noise is regulated by Section 59.5.0404 of the City's Noise Abatement and Control Ordinance. Section 59.5.0404 states that construction noise levels shall not exceed a 12-hour average sound level of 75 A-weighted decibel 12-hour average sound level (dB(A) Leq(12)) at the nearest residential property line. Noise generated during the construction of the project would be associated with workers driving to the project site and using equipment including sledge hammers, a jack hammer, shovels, and a dump truck. A concrete saw (82.6 dB(A) Leq at 50 feet) and a jackhammer (81.9 dB(A) Leq at 50 feet) generate the loudest noise levels. Construction of the secant pile walls landward of the existing seawall would generate noise as a result of drilling piles within the

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

footprint of the repaired lower concrete terrace and existing seawall down into soil. The typical drill rig used for this activity generates a noise level of 85 dB(A) at 50 feet with a duty cycle of 20 percent, which results in an average noise level of 78 dB(A) Leq at 50 feet. This noise level would attenuate to 71 dB(A) Leq at the nearest residence.

Construction activities would be required to comply with the construction hours specified in the City's Municipal Code (Section 59.5.0404, Construction Noise), which are intended to reduce potential adverse effects resulting from construction noise. Impacts would be less than significant.

b) Generation of, excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

The project would require drilling for the shoring piles. Ground vibrations in an outdoor environment are generally not perceptible (Federal Transit Administration [FTA] 2006). According to the FTA, vibration levels are 0.089 inch per second peak particle velocity (PPV) at 25 feet. Using FTA's recommended procedure for applying a propagation adjustment to these reference levels, vibration levels would exceed recommended thresholds (0.1 inch per second PPV) at distances of 20 feet or less. The nearest structure is more than 20 feet from potential drilling activities; thus, vibration impacts would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Please see responses XIII a) and b), the project would not result in substantial noise increase that would expose people residing or working in the area to a noise impact. Impacts would not occur.

XIV. POPULATION AND HOUSING – Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒

The project is the construction of a seawall and the removal of construction debris. Because of the scope of work, the project would not induce substantial population growth and impacts would not occur.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

See XIV a) impacts would not occur.

XV. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times or other performance objectives for any of the public services:

i) Fire protection; ☐ ☐ ☐ ☒

The project would not affect existing levels of residents in the area and would not require the construction or expansion of a fire facility. The project is located in a developed area where fire services exist and would not increase the demand on fire facilities over that which currently exists and would not result in any increase in demand for these services. Impacts would not occur.

ii) Police protection; ☐ ☐ ☐ ☒

The project would not affect existing levels of residents in the area and would not require the construction or expansion of police facilities. The project would not increase the demand on police facilities over that which currently exists and is would not result in any increase in demand for these services. Impacts would not occur.

iii) Schools; ☐ ☐ ☐ ☒

The project would not affect existing levels of students and would not require the construction or expansion of a school facility. The project site is located in a developed area where public school services are available. The project would not increase the demand on public schools over that which currently exists and is not anticipated to result in any increase in demand for public educational services. Impacts would not occur.

iv) Parks; ☐ ☐ ☐ ☒

The project would not affect existing levels of residents in the area and would not require the construction or expansion of a park and is located in an area with existing parks. The project would not increase the demand on parks over that which currently exists and is not anticipated to result any increase in demand for these services. Impacts would not occur.

v) Other public facilities? ☐ ☐ ☐ ☒

The project site is located in a developed area where City services are already available. The project would not adversely affect existing levels of demand of public services and would not require the construction or expansion of any governmental facilities. Therefore, no new public facilities beyond existing conditions would be required. Impacts would not occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒

The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒

The project is the construction of a seawall at an existing private hotel that does contain some recreational opportunities. The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur.

XVII. TRANSPORTATION– Would the project?				
a) Conflict with an adopted program, plan, ordinance or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?	☐	☐	☐	☒

The project would not affect existing levels of residents in the area and would not change road patterns or congestion. The project would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account of all modes transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. In addition, the project would not require the redesign of streets, traffic signals, stop signs, striping or any other changes to the existing roadways or existing public transportation routes or types are necessary. No impact would result due to implementation of the project.

b) Would the project or plan/policy result in VMT exceeding thresholds identified in the City of San Diego Transportation Study Manual? Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒

The project would not affect existing levels of residents in the area and would not result in additional VMT. The project would not exceed VMT thresholds identified in the City of San Diego Transportation Study Manual.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒

The project is not required to make any improvements to roads or streets and no dangerous road hazards would be introduced by the project. The construction of the seawall is an allowed use and impacts would not occur. Due to the design of the seawall the project would be a compatible use and no impacts would occur.

d) Result in inadequate emergency access?	☐	☐	☐	☒

The project is not required to make any improvements to roads or streets and would not affect emergency access. The construction of the seawall would not result in impacts.

XVIII. TRIBAL CULTURAL RESOURCES – Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒

The project would not cause a substantial adverse effect to tribal cultural resources, as there are no recorded sites listed or sites eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined by the Public Resources Code. No impact would occur.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

Tribal Cultural Resources include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Native American Tribe. Tribal Cultural Resources include “non-unique archaeological resources” that, instead of being important for “scientific” value as a resource, can also be significant because of the sacred and/or cultural tribal value of the resource. The City, as lead agency, determined that Tribal Cultural Resources pursuant to

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

subdivision Public Resources Code Section 5024.1(c) would not have the potential to be impacted through project implementation. No impact would occur.

XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which would cause significant environmental effects?	☐	☐	☐	☒

The project is not proposing any change to any water services and would not interrupt existing sewer service to the project site or other surrounding uses. The construction of the seawall would not increase demand for wastewater disposal or treatment as compared to current conditions. Wastewater treatment facilities used by the hotel would continue to be operated in accordance with the applicable wastewater treatment requirements of the Regional Water Quality Control Board (RWQCB). Additionally, the project site is in a developed area and adequate services are already available to serve the project and no mitigation measures are required. No impact would occur.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒

The project does not meet the CEQA significance threshold that would require the preparation of a water supply assessment. The existing project site currently receives water service from the City, and adequate services are available to serve the proposed project without required new or expanded entitlements. No impact would occur.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's demand in addition to the provider's existing commitments?	☐	☐	☐	☒

See XIX b), impacts would not occur.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

All construction waste from the project site would be transported to an appropriate facility, which would have adequate capacity to accept the limited amount of waste that would be generated by the project. Long-term operation of the proposed seawall is not anticipated to generate additional solid waste. Furthermore, the project would be required to comply with the City's Municipal Code for

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

diversion of both construction waste during the demolition phase and solid waste during the long-term, operational phase. Impacts would be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

The project would comply with all Federal, State, and local statutes and regulations related to solid waste. The project would not result in the generation of large amounts of solid waste, nor would it generate or require the transportation of hazardous waste materials. All demolition activities would comply with City of San Diego requirements for diversion of both construction waste during the demolition phase and there would be not solid waste generated during the long-term, operation of the project. No impact would occur.

XX. WILDFIRE – If located in or near state responsibility area or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

The City of San Diego participates in the San Diego County Multi-Jurisdictional Hazard Mitigation Plan. The project complies with the General Plan and is consistent with the OBCP land use and the Land Development Code's zoning designation. The project is located in a developed area of San Diego and construction of the seawall would not disrupt any emergency evacuation routes as identified in the Hazard Mitigation Plan. Therefore, the project would not impact an emergency response and evacuation plan during construction and operation. No impact would occur.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	☐	☐	☐	☒

The project is surrounded by existing development and the Pacific Ocean to the west and there are no wildlands in the area. Due to the location of the project, the project would not have the potential to expose occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. Therefore, impacts would not occur.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒

The site is currently serviced by existing infrastructure which would service the site after construction is completed. No new construction of roads, fuel breaks, emergency water sources,

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

power lines, or other utilities would be constructed that would exacerbate fire risk, therefore impacts would not occur.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Refer to response XX (b) above. Additionally, the project would comply with the City's appropriate Best Management Practices (BMP) for drainage and would not expose people or structures to significant risks as a result of run-off, post-fire slope instability, or drainage changes. Therefore, impacts would not occur.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE –

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

Potentially significant impacts to the environment resulting from the proposed project have been identified for the areas of biological resources**.** However, the project would not substantially degrade the quality of the environment, cause fish or wildlife populations to drop below self-sustaining levels or threaten to eliminate a plant or animal community. The project has the potential to cause direct and indirect impacts to sensitive species but impacts would be reduced to below a level of significance through the implementation of mitigation measures.

b) Does the project have impacts that are individually limited but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐

Cumulative environmental impacts are those impacts that by themselves are not significant, but when considered with impacts occurring from other projects in the vicinity would result in a cumulative impact. Related projects considered to have the potential of creating cumulative impacts in association with the project consist of projects that are reasonably foreseeable and that would be constructed or operated during the life of the project.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The Inn at Sunset Cliffs would result in potential impacts but the required mitigation would avoid impact to resources. Other future projects within the surrounding area would be required to comply with applicable local, state, and federal regulations to reduce potential impacts to less than significant, or to the extent possible. As such, the project is not anticipated to contribute to potentially significant cumulative environmental impacts. Project cumulative impacts would be less than significant with mitigation.

c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

The Initial Study did not identify any significant impacts to human beings. Therefore, the project would not create conditions that would significantly directly or indirectly impact human beings. No impacts would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

INITIAL STUDY CHECKLIST
REFERENCES

I. Aesthetics / Neighborhood Character

- ☒ City of San Diego General Plan
- ☒ Community Plan: Kearny Mesa Community Plan
- ☒ Other: California State Scenic Highway Mapping System

II. Agricultural Resources & Forest Resources

- ☐ City of San Diego General Plan
- ☐ U.S. Department of Agriculture, Soil Survey - San Diego Area, California, Part I and II, 1973
- ☐ California Agricultural Land Evaluation and Site Assessment Model (1997)
- ☐ Site Specific Report:
- ☒ Other: California Department of Conservation. 2016. California Important Farmland Finder.

III. Air Quality

- ☐ California Clean Air Act Guidelines (Indirect Source Control Programs) 1990
- ☒ Regional Air Quality Strategies (RAQS) - APCD
- ☐ Site Specific Report:
- ☐ Other:

IV. Biology

- ☒ City of San Diego, Multiple Species Conservation Program (MSCP), Subarea Plan, 1997
- ☐ City of San Diego, MSCP, "Vegetation Communities with Sensitive Species and Vernal Pools" Maps, 1996
- ☒ City of San Diego, MSCP, "Multiple Habitat Planning Area" maps, 1997
- ☐ Community Plan – Kearny Mesa Community Plan
- ☐ California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered, Threatened, and Rare Plants of California," January 2001
- ☐ California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered and Threatened Animals of California, "January 2001
- ☐ City of San Diego Land Development Code Biology Guidelines
- ☒ Site Specific Report: Coastal Bluff Stabilization Project at the Inn at Sunset Cliffs: Intertidal Biological Assessment (Marine Taxonomic Services, LTD., September 2021)

V. Cultural Resources (includes Historical Resources)

- ☒ City of San Diego Historical Resources Guidelines
- ☐ City of San Diego Archaeology Library
- ☐ Historical Resources Board List
- ☐ Community Historical Survey
- ☐ Site Specific Report:
- ☒ Other: California Historic Resources Information System (CHRIS)

VI. Geology/Soils

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

☒ City of San Diego Seismic Safety Study
☐ U.S. Department of Agriculture Soil Survey - San Diego Area, California, Part I and II, December 1973 and Part III, 1975
☐ Site Specific Report: Geotechnical Report, The Inn at Sunset Cliffs (TerraCosta Consulting, December 2020.)

☒ City of San Diego General Plan

VII. Greenhouse Gas Emissions

☒ Site Specific Report: Climate Action Plan Consistency Checklist.

VIII. Hazards and Hazardous Materials

☐ San Diego County Hazardous Materials Environmental Assessment Listing
☐ San Diego County Hazardous Materials Management Division
☐ FAA Determination
☐ State Assessment and Mitigation, Unauthorized Release Listing, Public Use Authorized
☐ Airport Land Use Compatibility Plan – MCAS Miramar; Montgomery Field
☐ Site Specific Report:
☐ Other:

IX. Hydrology/Drainage

☒ Flood Insurance Rate Map (FIRM)
☐ Federal Emergency Management Agency (FEMA), National Flood Insurance Program-Flood Boundary and Floodway Map
☐ Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html
☐ Site Specific Report:

IX. Hydrology/Drainage

☒ Flood Insurance Rate Map (FIRM)
☒ Federal Emergency Management Agency (FEMA), National Flood Insurance Program-Flood Boundary and Floodway Map
☐ Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html
☐ Site Specific Report:

X. Land Use and Planning

☒ City of San Diego General Plan
☒ Ocean Beach Community Plan
☒ Airport Land Use Compatibility Plan
☒ City of San Diego Zoning Maps
☐ FAA Determination:
☐ Other Plans:

XI. Mineral Resources

☐ California Department of Conservation - Division of Mines and Geology, Mineral Land Classification
☐ Division of Mines and Geology, Special Report 153 - Significant Resources Maps
☐ City of San Diego General Plan: Conservation Element
☐ Site Specific Report:

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

XII. Noise

☒ City of San Diego General Plan
☒ Ocean Beach Community Plan
☒ San Diego International Airport - Lindbergh Field CNEL Maps
☐ Brown Field Airport Master Plan CNEL Maps
☐ Montgomery Field CNEL Maps
☐ San Diego Association of Governments - San Diego Regional Average Weekday Traffic Volumes
☒ San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
☐ Site Specific Report:

XIII. Paleontological Resources

☒ City of San Diego Paleontological Guidelines
☐ Deméré, Thomas A., and Stephen L. Walsh, "Paleontological Resources City of San Diego," Department of Paleontology San Diego Natural History Museum, 1996
☐ Kennedy, Michael P., and Gary L. Peterson, "Geology of the San Diego Metropolitan Area, California. Del Mar, La Jolla, Point Loma, La Mesa, Poway, and SW 1/4 Escondido 7 1/2 Minute Quadrangles," *California Division of Mines and Geology Bulletin* 200, Sacramento, 1975
☒ Kennedy, Michael P., and Siang S. Tan, "Geology of National City, Imperial Beach and Otay Mesa Quadrangles, Southern San Diego Metropolitan Area, California," Map Sheet 29, 1977
☐ Site Specific Report:

XIV. Population / Housing

☒ City of San Diego General Plan
☒ Community Plan
☐ Series 11/Series 12 Population Forecasts, SANDAG
☐ Other:

XV. Public Services

☒ City of San Diego General Plan
☒ Ocean Beach Community Plan

XVI. Recreational Resources

☒ City of San Diego General Plan
☐ Community Plan
☐ Department of Park and Recreation
☐ City of San Diego - San Diego Regional Bicycling Map
☐ Additional Resources:

XVII. Transportation / Circulation

☒ City of San Diego General Plan
☒ Ocean Beach Community Plan
☐ San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
☐ San Diego Region Weekday Traffic Volumes, SANDAG
☐ Site Specific Report:

XVIII. Utilities

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

☐ Site Specific Report:

XIX. Water Conservation

☐ Sunset Magazine, *New Western Garden Book*, Rev. ed. Menlo Park, CA: Sunset Magazine

XX. Water Quality

☐ Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html

☐ Site Specific Report:

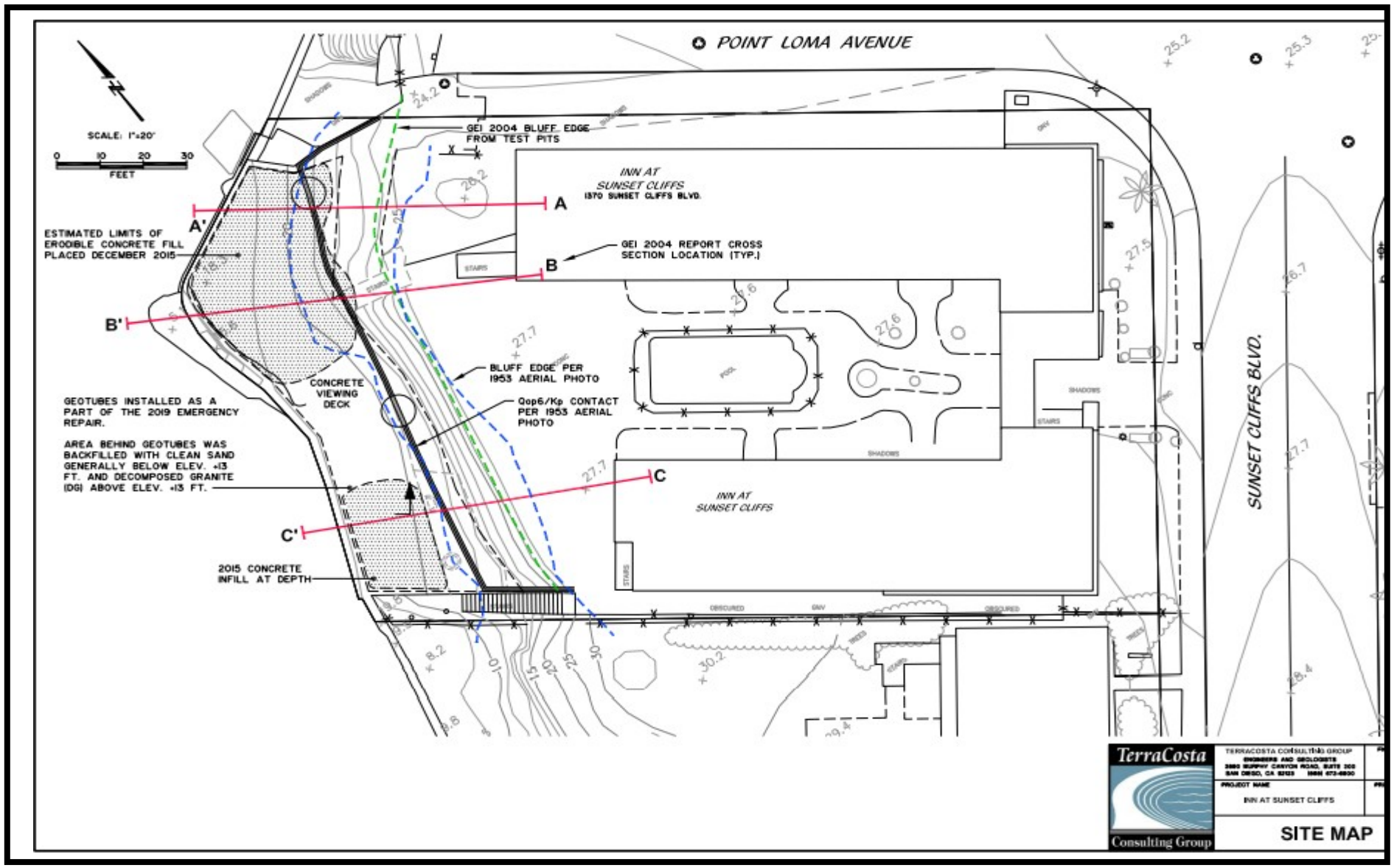
Location Map

Inn At Sunset Cliffs/Project No. 231328

City of San Diego – Development Services Department

FIGURE

No. 1



Site Plan

Inn at Sunset Cliffs / Project No. 321328

City of San Diego – Development Services Department

FIGURE

No. 2