



**CEQA and COASTAL DETERMINATIONS
and
NOTICE OF APPROVAL**

Project: Hilton San Diego Bayfront Hotel Renovations
Location: 1 Park Boulevard, San Diego, CA 92101
Parcel No.: 019-044
Project No.: 2025-060
Applicant: Robert Springer, Senior Vice President, Sunstone, LLC, 15 Enterprise Suite 200, Aliso Viejo, CA 92656
Date: 10/16/2025

PROJECT DESCRIPTION

The proposed project would involve renovations at the Hilton San Diego Bayfront Hotel by One Park Boulevard, LLC, in the city of San Diego, California. The proposed project would involve interior and exterior renovations of an existing hotel facility. Interior renovations would consist of improvements to existing guest rooms, common areas such as lobbies, meeting spaces, ballrooms, restroom facilities, and the bar and club lounge. Exterior renovations would consist of improvements to the pool area, porte-cochere, outdoor bar and the refreshment of existing landscape areas. Work to specifically complete the proposed project is outlined below:

Guestrooms

Proposed guestroom improvements would include interior renovations to approximately 1190 existing guestrooms, including replacement or improvement of:

- Furnishing, fixtures, and equipment;
- Showers;
- Doors;
- Lighting;
- Furnishings, fixtures, and finishes; and
- Associated mechanical, electrical, and plumbing work.

All interior improvements and renovations would remain within the footprint of the existing hotel rooms and would not result in the addition of guest rooms.

Common Areas

Proposed improvements to common areas including but not limited to:

- Corridors;
- Meeting Spaces;
- Lobbies;
- Ballrooms; and
- Public Restrooms.

Proposed improvements would include replacement or improvement of:

- Lighting;
- Flooring;
- Wall finishing; and
- Associated mechanical, electrical, and plumbing work.

All interior improvements and renovations would remain within the footprint of the existing common areas and would not result in the addition of capacity.

Registration Area and Lobby and Corridor

Proposed improvements to the registration area, lobby and corridor would include:

- Lighting;

- Flooring; and
- Furniture, fixtures and finishes.

All interior improvements and renovations would remain within the footprint of the existing area and would not result in the addition of capacity of the space.

Bar Lounge

Proposed improvements to the bar would include replacement or improvement of:

- Lighting;
- Furniture, fixtures and finishes; and
- Associated mechanical, electrical, and plumbing improvements.

Other renovations would include:

- Installation of new Nano-Wall style doors leading to the outdoor patio space.

All interior improvements and renovations would remain within the footprint of the existing bar and would not result in the addition of capacity of the bar space.

Club Lounge

Proposed improvements to the club lounge would include replacement or improvement of:

- Lighting;
- Flooring;
- Furnishings, fixtures, and finishes; and
- Associated mechanical, electrical, and plumbing improvements.

All interior improvements and renovations would remain within the footprint of the existing club lounge and would not result in the addition of capacity of the club lounge space.

Hotel Entry and Porte-Cochere

Proposed improvements to the hotel entry and the porte-cochere would include:

- Lighting, and
- Furnishings, fixtures, and finishes.

Additionally, adjacent to the Porte-Cochere, outdoor seating would be installed to enhance the existing arrival space. Improvements would not result in the addition of capacity to the hotel facility.

Pool Area/Deck

Proposed improvements to the pool and lawn areas, which are located on the southwest side of the hotel, would consist of the following:

- Furniture, fixtures, and equipment;
- Refreshment of existing landscaping;
- Remodel of existing kids play area;
- Replacement of cabana structures;
- Replacement of light fixtures;
- Infill of one (1) existing spa;
- Landscape improvements;
- Associated mechanical, electrical, and plumbing improvements; and
- Demolition and relocation of existing bar area of substantially the same size, and associated finishes.

The proposed scope of the pool and event lawn area improvements would not involve the expansion of the existing spaces or event capacity and would be limited to the existing footprint.

The proposed renovations are anticipated to begin in Winter 2025 and would be carried out in two (2) phases over the course of approximately two (2) years. The first phase would consist of the proposed

renovations and improvements to the pool and event lawn areas, as well as the initial work on the meeting space areas and guestrooms, which are anticipated to take approximately two (2) months. The second phase would consist of the remaining meeting space areas and guestrooms and other proposed interior and hotel entry renovations. The laydown area for the first and second phase of work would utilize approximately 40 parking spaces within the leasehold, which are not currently used for guest parking and are not anticipated to impact the availability of public parking. Renovation work would not restrict public access at the site at any time. Construction crews would utilize nearby ACE lots for parking and incorporate carpooling to reduce vehicle trips. Construction crews would utilize nearby ACE lots for parking and incorporate carpooling to reduce vehicle trips. Construction crews would utilize nearby ACE lots for parking and incorporate carpooling to reduce vehicle trips.

Due to its nature and limited scope, construction of the proposed project would generate a minor number of vehicle trips and would require limited use of equipment. Exterior and interior improvements associated with the first phase of work are anticipated to require minimal use of a bobcat, dump truck, scissor lifts jackhammers associated with the removal of debris and transportation of materials, and no other large or special equipment. Minimal truck trips associated with the removal of debris and transportation of materials are anticipated to be generated for this phase of work. Interior improvements associated with the second phase of work are anticipated to require use of scissor lifts and no other large or special equipment. The April 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA (Advisory) prepared by the former State of California Governor's Office of Planning and Research¹, outlines how utilizing Vehicle Miles Travelled to evaluate transportation impacts under CEQA helps implement Senate Bill 32, a greenhouse gas (GHG) emissions reduction bill. The advisory asserts that projects that generate or attract fewer than 110 trips² per day generally may be assumed to cause a less-than-significant transportation impact. As the project is anticipated to generate a maximum use of 40 vehicles or 80 vehicle trips per day, or approximately 1 truck trip per week, it is not anticipated to cause a significant transportation impact. Lastly, the proposed project would not result in a change in size, capacity, or operations of the hotel facility from that which is currently existing. Therefore, the Project would not result in impacts related to air quality, greenhouse gas emissions, transportation and traffic.

Furthermore, the Applicant would be responsible for complying with all applicable federal, state, and local laws regarding construction demolition debris, hazards and hazardous materials, and stormwater.

The following categorical determinations are based on the project submittal and all project information known to the District as of the date of this determination.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

CATEGORICAL DETERMINATION

¹ Governor's Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018, pp. 12, https://lci.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

² Ibid., pp. 12.

"Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impact."

"CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301, subd. (e)(2).) Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact."

Categorical Exemptions: Class 1 - Existing Facilities (CEQA Guidelines § 15301; District Guidelines § 3.a.); CEQA Guidelines Section 15302 (Class 2)/District Guidelines for Compliance with CEQA Section 3.b: Replacement or Reconstruction; Class 3 - New Construction or Conversion of Small Structures (CEQA Guidelines § 15303; District Guidelines § 3.c.); and CEQA Guidelines Section 15304 (Class 4)/District Guidelines for Compliance with CEQA Section 3.d: Minor Alterations to Land

Class 1 - Existing Facilities (CEQA Guidelines § 15301; District Guidelines § 3.a.): Includes operation, repair, maintenance, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that previously existing, including but not limited to:

- (3) Interior and exterior remodeling or alterations, involving negligible or no expansion of use beyond that previously existing, including, but not limited to, marine terminal facilities, and marine-oriented commercial, industrial, and public and commercial recreational facilities, including buildings, piers, wharves, marine ways; railroads; airport facilities, runways, taxiways, aprons, and ancillary structures to those facilities; or mechanical systems and equipment.
- (5) Minor exterior or interior alterations to incorporate architectural changes.
- (12) Maintenance of existing landscaping, native growth, and water supply reservoirs.

AND/OR

Class 2 - Replacement or Reconstruction (CEQA Guidelines § 15302; District Guidelines § 3.b.): Includes replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site and will have substantially the same purpose and capacity as the structure being replaced.

- (2) Replacement or reconstruction of marine terminal facilities, and marine-oriented commercial, industrial, and public and commercial recreational facilities, including buildings, piers, piles, wharves, marine ways; railroads; airport facilities, runways, taxiways, aprons, and ancillary structures to those facilities; electrical and mechanical systems and equipment; where the new structure will be on essentially the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

AND/OR

Class 3 – New Construction or Conversion of Small Structures (CEQA Guidelines § 15303; District Guidelines § 3.c.): Includes construction of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and conversion of existing small structures from one use to another with minor modifications to the exterior of the structure. Examples of this exemption include:

- (2) Accessory (appurtenant) structures and mechanical equipment including, but not limited to, garages, sheds, railway spur tracks, pilings, temporary trailers, industrial equipment, enclosures, fences, parking, on-site roadways, walkways and health and safety devices.

AND/OR

Class 4 – Minor Alterations to Land (CEQA Guidelines § 15304; District Guidelines § 3.d.): Includes minor alterations in the condition of land, water and/or vegetation not involving removal of mature, scenic trees, including, but not limited to

- (5) New gardening or landscaping.
- (7) Minor trenching and backfilling where the surface is restored.

The proposed project is determined to be Categorically Exempt pursuant to the CEQA Guidelines and the Sections of the District's *Guidelines for Compliance with CEQA* as identified above. These are appropriate for the proposed project because it would consist of interior and exterior renovation to an existing hotel facility that would involve no expansion of use beyond that previously existing; would not

result in a significant cumulative impact due to the continuation of the existing use; would be located on the same sites and would have substantially the same purpose and capacity as the structures replaced; would consist of the construction and location of new, small structures; would result in no permanent effects on the environment; and would not involve the removal of mature, scenic trees. The District has determined none of the six exceptions to the use of a categorical exemption apply to this project (CEQA Guidelines § 15300.2).

Pursuant to CEQA Guidelines Section 15062, a 35-day statute of limitations for this CEQA exemption shall apply from the date a Notice of Exemption is posted with the San Diego County Clerk, or a 180-day statute of limitations for this CEQA exemption shall apply if no Notice of Exemption is filed.

CALIFORNIA COASTAL ACT

PORT MASTER PLAN CONSISTENCY

Planning District: 3 - Centre City Embarcadero (Precise Plan Figure 11)

Land Use Designation: Commercial Recreation

The proposed project conforms to the certified Port Master Plan because it would interior and exterior renovations to an existing hotel consistent with the existing certified Land Use designation. The proposed project would not change the use of the site nor would it interrupt or expand the existing conforming uses of the site.

CATEGORICAL DETERMINATION

Categorical Exclusions: Section 8.a: Existing Facilities; Section 8.b: Replacement or Reconstruction; Section 8.c: New Construction or Conversion of Small Structures; and Section 8.d: Minor Alterations to Land

Existing Facilities (District Coastal Development Permit Guidelines § 8.a.): The operation, repair, maintenance, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that previously existing, including but not limited to:

- (2) Public and private utilities used to provide electric power, natural gas, sewer, or other utility services.
- (8) Maintenance and control of existing vegetation.
- (12) Interior and exterior remodeling of airport facilities, marine terminal facilities, existing marine-oriented industrial structures, and commercial or recreations facilities.

AND/OR

Replacement or Reconstruction (District Coastal Development Permit Guidelines § 8.b.): Replacement or reconstruction of existing structures and facilities where the new structure will be located essentially on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

- (1) Replacement of a commercial structure with a new structure of substantially the same size, purpose, and capacity.
- (2) Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansions of capacity.

AND/OR

New Construction or Conversion of Small Structures (District Coastal Development Permit Guidelines § 8.c.): Construction and location of limited numbers of new, small facilities or structures and installation of small, new equipment and facilities, involving negligible or no change of existing use of the property, including but not limited to:

- (3) Accessory structures, including, but not limited to, on-premise signs, small parking lots, fences, walkways, swimming pools, miscellaneous work buildings, temporary trailers,

small accessory piers, minor mooring facilities, buoys, floats, pilings, or similar structures; and seasonal or temporary use items such as lifeguard towers, mobile food units, portable restrooms, or similar structures.

AND/OR

Minor Alterations to Land (District Coastal Development Permit Guidelines § 8.d.): Minor public or private alterations in the condition of land, water, and/or vegetation which do not involve the removal of mature, scenic trees, including but limited to:

- (2) New gardening and landscaping.
- (6) Minor trenching or backfilling where the surface is restored.

The proposed project is determined to be Categorically Excluded pursuant to the Sections of the District's *Coastal Development Permit Regulations* as identified above because it would consist of interior and exterior renovations to an existing hotel that would involve negligible expansion of use beyond that previously existing; would be located essentially on the same site and will have substantially the same purpose and capacity as the structures replaced; would involve no change of existing use of the property; and would not involve the removal of mature, scenic trees.

Pursuant to California Coastal Act Section 30717, there is a 10-working-day period to appeal this "Coastal Act Categorical Determination of Exclusion" to the California Coastal Commission.

CALIFORNIA PUBLIC TRUST DOCTRINE

The proposed project complies with Section 87.(a)(2) of the Port Act, which allows for all visitor-serving commercial and industrial uses and purposes, and the construction, reconstruction, repair, and maintenance of commercial and industrial buildings, plants, and facilities. The Port Act was enacted by the California Legislature and is consistent with the Public Trust Doctrine. Consequently, the proposed project is consistent with the Public Trust Doctrine.

SCOTT CHADWICK
President/CEO

Determination by:
Betsy Viramontes
Assistant Planner
Development Services

Signature: Betsy Viramontes
Date: 10/16/2025

Assistant/Deputy General Counsel

Signature: Shiraz Tangri
Date: 10/16/2025