



CEQA and COASTAL DETERMINATIONS and NOTICE OF APPROVAL

Project: Ocean Ecostructures Life Boosting Units Pilot Project
Location: Shelter Island Fishing Pier, 1776 Shelter Island Dr, San Diego, CA 92106
 Grape Street Pier, 1800 N Harbor Dr, San Diego, CA 92101
 J Street Pier, 999 Bayside Parkway, Chula Vista, CA 91910
Parcel No.: Various
Project No.: 2026-055
Applicant: David Rodés, Ocean Ecostructures SL, WTC Barcelona, Moll de Barcelona s/n, East Building, 1st Floor, 08039 Barcelona, Spain; +346292268
Date Approved: October 13, 2026

PROJECT DESCRIPTION

The proposed project is a two-year pilot project through the San Diego Unified Port District's (District) Blue Economy Incubator (BEI) program that would involve the installation of up to 30 Life Boosting Units® (LBUs) to enhance the biodiversity of marine life at scale at various locations within San Diego Bay. Ocean Ecostructures (Applicant) has developed LBUs to replicate the way natural reefs work by stimulating the growth of fully functional and complex ecosystems and naturalize damaged environments. The aim of this two-year pilot project is to demonstrate Ocean Ecostructures' LBUs ability to enhance marine life in a port environment by accurately measuring and quantifying the environmental and socioeconomic impacts generated, while also analyzing the associated business benefits.

Work to specifically complete the proposed project would involve the installation of up to 30 LBUs across three (3) locations on District Tidelands, with ongoing monitoring and maintenance as-needed. The LBUs are a portable, steel-coated structure with a calcium carbonate layer of variable thickness (between 0.8 and 1.3 mm), which promotes the attachment and colonization of marine benthic species. The LBUs measure approximately 3.3 ft × 4.9 ft × 1.15 ft, weigh 60 kg, and are designed for attachment to pilings underwater. Construction of the proposed project is anticipated to occur in approximately Fall 2026 and would take approximately five (5) working days to complete with ongoing monitoring, maintenance, and removal as needed. Depending on the proposed location and contractor availability, installation could be scheduled over the course of a few weeks.

For piling installation, a non-invasive method using mechanical clamping and a stainless steel, riveting bracket system is used to install the LBUs. A diver would be required to install the system and attach the LBU using ratchet straps. No drilling is required, and structures could easily be relocated to a different pile if needed. The Applicant and its contractors would scrape existing marine growth at designated attachment areas prior to installation. All LBUs would extend slightly beyond the pilings, and marine life would not be prohibited from growing behind the LBUs once installed. Should repair or replacement of the existing pilings become necessary, the LBUs would be temporarily relocated to a nearby area during construction activities and then returned to their original location once construction is complete.

Equipment required for all installation and removal activities includes a surface-based air compressor, a pneumatic hammer drill, manual ratchets, a riveting tool, and specialized scrapers to prepare the surface. To assist the diver with installation, professional underwater lift bags are used to neutrally buoy the 100 lb units. All equipment is portable and can be managed from a small van for landside installations or a 15–20 ft boat for water-based installations. Individual units are sized to fit a 40x60-inch pallet, making the entire equipment setup compact and easy to deploy within active port environments.

Quarterly monitoring would occur for the duration of the two-year pilot. The units would be monitored using remotely operated vehicles (ROVs), and the imaging collected would be processed through the Applicant's artificial intelligence (AI) models. More specifically, the AI models would analyze a range of biological and physicochemical parameters, including biodiversity through the identification and taxonomic classification of all detected species; ecological function through the evaluation of functional groups; and the detection of any invasive, non-native species and their potential impacts on local biodiversity. The AI models would also

estimate biomass by calculating the dry weight of benthic organisms on the LBUs, as well as the amount of fixed CO₂ derived from the generated biomass. In addition, the analysis would incorporate the ARMI Index for ecosystem characterization, a multivariable indicator used to evaluate the ecological and functional quality of the fish community, including ecosystem structure, mean trophic level, vulnerability, and economic importance. Physicochemical parameters such as temperature, turbidity, and chlorophyll levels would also be measured and analyzed.

The LBUs include suspended plates, which would be retrieved during monitoring events to inform the biomass analysis. All data from monitoring would be transcribed into the iOceans platform, the Applicant's App, Impact Reports and audiovisual material suitable for future educational opportunities and public dissemination. The Applicant shall work with the District on a communications plan for future public dissemination of data collected and lessons learned from the pilot project, which may include the installation of small-scale educational signage. All monitoring results and data collected would be reviewed and verified by the District, and the associated reports would be subject to a third-party external review. The Applicant and their contractors would be responsible for coordinating monitoring events with the District and any Tenants that may be affected by data collection activities. Land-based and water-based access through the use of a small vessel may be required to complete monitoring and data collection.

LBUs promote the development of complex ecosystems from the organisms naturally present in the surrounding waters. These may include both native and non-native species. Regular monitoring and species identification would support the early detection of invasive species, should they be present in the area. If any invasive species are detected on the LBUs, the Applicant would follow the established protocol for invasive species removal, notify California Coastal Commission staff, and coordinate accordingly with the appropriate regulatory agencies. This may include adhering to policies and guidance within the San Diego Bay Integrated Natural Resources Management Plan (INRMP) which was developed by the District and the United States Navy. This could include: the Applicant and the District would utilize adaptive management principles to coordinate on a response by prioritizing eradication while avoiding harm to sensitive habits (e.g., eelgrass and/or native species detected on the LBUs), and conducting follow-up monitoring to evaluate success of removal. The District may request more frequent monitoring if invasive species are detected.

The District would evaluate the success of the LBUs in their ability to recruit native taxonomy to San Diego Bay and the viability of the LBUs as a method to create natural reefs in areas with hardened infrastructure. Removal would be conducted using tools and methods similar to what would be required for installation.

The proposed pilot project would involve a Tidelands Use and Occupancy Permit (TUOP) for the use of water area to pilot, install, maintain, monitor, and if required by the District, remove the Applicant's LBUs. It is anticipated that the TUOP would have a minimum term of two years. The TUOP may be terminated by the District or Tenant as a matter of right and without cause at any time upon providing thirty-day notice in writing to the other party of such termination. A "Blue Economy Agreement" by and between the District and the Applicant is also proposed, and other similar agreements may also be required.

Due to its nature and limited scope, construction of the proposed project would generate a minor amount of vehicle trips and would require limited use of equipment. Therefore, impacts related to air quality, greenhouse gas emissions, and transportation and traffic are not anticipated to occur. 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

Categorical Exemptions: CEQA Guidelines Section 15301 (Class 1)/District Guidelines for Compliance with CEQA Section 3.a: Existing Facilities; CEQA Guidelines Section 15303 (Class 3)/District Guidelines for Compliance with CEQA Section 3.c: New Construction or Conversion of Small Structures; CEQA Guidelines Section 15306 (Class 6)/District Guidelines for Compliance with CEQA Section 3.f: Information Collection and CEQA Guidelines Section 15311 (Class 11)/District Guidelines for

Compliance with CEQA Section 3.i: Accessory Structures

3.a. Existing Facilities (SG § 15301) (Class 1): 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:

- (1) Repair, maintenance or minor alteration of existing mooring facilities, floats, piers, piles, wharves, bulkhead, revetment, buoys, or similar structures; marine terminal facilities; airport facilities; and commercial industrial, or recreational facilities.

AND/OR

3.c. New Construction or Conversion of Small Structures (SG § 15303) (Class 3): 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.

AND/OR

3.f. Information Collection (SG § 15306) (Class 6): Includes basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource. These may be for information gathering purposes, or as part of a study leading to an action which has not yet been approved, adopted or funded.

AND/OR

3.i. Accessory Structures (SG § 15311) (Class 11): Includes construction, or placement of minor structures accessory to (appurtenant to) existing facilities, including:

- (1) Construction or placement of minor mooring facilities, floats, buoys or similar structures accessory to (appurtenant to) existing commercial, industrial or institutional facilities.

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 pilot project because it would be a nature study 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 consist of the construction and location of small, new structures, would result in no permanent effects on the environment, and is for the purpose of basic data collection/research/experimental management/resource evaluation activities which would not result in a serious or major disturbance to an environmental resource. The District has determined none of the six exceptions to the use of a categorical exemption apply to this project (CEQA Guidelines Section 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 Districts: 1 - Shelter Island/La Playa (Precise Plan Figure 4); 3 - Centre City Embarcadero; and 7 - Chula Vista Bayfront (Precise Plan Figure 19)

Water Use Designations: Recreational Boat Berthing; Open Bay/Water; and Specialized Berthing

The proposed project conforms to the certified Port Master Plan because it would involve a pilot project to enhance marine life in a port environment using Ocean Ecostructures Life Boosting Units consistent with the existing certified Water use designations. 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.c: New Construction or Conversion of

Small Structures; and Section 8.e: Information Collection

8.a. Existing Facilities: 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:

- (10) Repair, maintenance, or minor alteration of existing mooring facilities, floats, piers, bulkhead, revetment, buoys, or similar structures;

AND/OR

8.c. New Construction or Conversion of Small Structures: 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

8.e. Information Collection: Basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major significant disturbance to an environmental resource.

The proposed project is determined to be Categorically Excluded pursuant to the Sections of the District's *Coastal Development Permit Regulations* as identified above. These are appropriate for the proposed pilot project because it would be a nature study that would involve negligible or no expansion of use beyond that previously existing, would involve negligible or no change of existing use of the property, and would not result in a serious or major significant disturbance to an environmental resource.

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)(1) of the Port Act, which allows for the establishment, improvement, and conduct of a harbor, and for the construction, reconstruction, repair, maintenance, and operation of wharves, docks, piers, slips, quays, and all other works, buildings, facilities, utilities, structures, and appliances incidental, necessary, or convenient, for the promotion and accommodation of commerce and navigation. 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:

Lillian Mattes
Senior Planner
Planning

Signature: Lillian Mattes
Date: 10/15/2026

Deputy/Assistant General Counsel

Signature: Shiraz Tangri
Date: 10/15/2026