**CITY OF SAN CLEMENTE**
**PLANNING DIVISION**

Jonathan Lightfoot
*City Planner*
(949) 361-8254
Lightfootj@san-clemente.org

October 8, 2025

Orange County Clerk
Environmental Notices and Postings
CC: Governor's Office of Land Use and Climate Innovation

RE: **Notice of Determination for Marblehead Hotel Height Exception**

Please find enclosed a Notice of Determination for an Amendment to the Marblehead Coastal Specific Plan and a project amendment to Commercial Site Plan Permit (SPP) 99-16 And Conditional Use Permit (CUP) 99-17 to modify the previously approved height of the hotel, from 45 feet up to 62 feet, at 401 W. Avenida Vista Hermosa to include a rooftop restaurant with outdoor dining and interior kitchen and restrooms on a 1.7-acre parcel (Assessor's Parcel Number [APN] 691-422- 04) within the Marblehead Coastal Specific Plan (MCSP) area.

The City prepared **Addendum No. 6** (attached to the NOD) to the previously certified FEIR for the MCSP (**State Clearing House [SCH] No. 1995091037**) has been prepared in accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15164 which requires a Lead Agency to revise a certified EIR to accurately reflect any changes or additions to the project, changes in conditions under which the project is undertaken, or to add new information. In accordance with CEQA Guidelines Section 15162, changes to the approved project addressed in this addendum would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects identified in the 1998 FEIR and subsequent addenda. Nor is there any new information, not disclosed at the time of the prior environmental analyses, that shows the potential for any such new or more severe impacts. and finding that Addendum No. 6 to the MCSP Final Environmental Impact Report demonstrates no new significant impacts and that no further environmental review is needed, consistent with CEQA Guidelines §15162 And §15183.

An Addendum to
Sincerely,

Jonathan Lightfoot

Jonathan Lightfoot

City Planner
City of San Clemente

Print Form

# Notice of Determination

**Appendix D**

**To:**

☒ Office of Planning and Research

*U.S. Mail:* P.O. Box 3044, Sacramento, CA 95812-3044

*Street Address:* 1400 Tenth St., Rm 113, Sacramento, CA 95814

☒ County Clerk
County of: Orange
Address: _____

**From:**
Public Agency: City of San Clemente
Address: 910 Calle Negocio
San Clemente, CA 92673
Contact: Jonathan Lightfoot
Phone: 949-361-8254

Lead Agency (if different from above):
_____
Address: _____
_____
Contact: _____
Phone: _____

***SUBJECT: Filing of Notice of Determination in compliance with Section 21108 or 21152 of the Public Resources Code.***

State Clearinghouse Number (if submitted to State Clearinghouse): 1995091037 (existing)

Project Title: Height Exception for a hotel in the Marblehead Coastal Specific Plan to be built to 62'

Project Applicant: LODGE AT SAN CLEMENTE LLC

Project Location (include county): 401 W. Ave. Vista Hermosa, San Clemente, CA 92673 (Orange)

Project Description:

An Amendment to a previously approved hotel, allowing a height exception up to 62 feet to include a rooftop restaurant with outdoor dining and interior kitchen and restrooms on a 1.7-acre parcel (APN 691-422-04) within the Marblehead Coastal Specific Plan area, and finding that Addendum No. 6 to the MCSP Final Environmental Impact Report demonstrates no new significant impacts and that no further environmental review is needed, consistent with CEQA Guidelines §15162 And §15183

This is to advise that the City of San Clemente has approved the above
(☒ Lead Agency or ☐ Responsible Agency)

described project on 10/7/2025 (date) and has made the following determinations regarding the above described project.

1. The project [☐ will ☒ will not] have a significant effect on the environment.
2. ☒ An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.
   ☐ A Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures [☒ were ☐ were not] made a condition of the approval of the project.
4. A mitigation reporting or monitoring plan [☒ was ☐ was not] adopted for this project.
5. A statement of Overriding Considerations [☒ was ☐ was not] adopted for this project.
6. Findings [☒ were ☐ were not] made pursuant to the provisions of CEQA.

This is to certify that the final EIR with comments and responses and record of project approval, or the negative Declaration, is available to the General Public at:
https://www.san-clemente.org/home/showpublisheddocument/50253/636846196849400000

Signature (Public Agency): Jonathan Lightfoot Title: City Planner

Date: 10/8/2025 Date Received for filing at OPR: _____

Authority cited: Sections 21083, Public Resources Code.
Reference Section 21000-21174, Public Resources Code.

Revised 2011

ORDINANCE NO. 1795

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF SAN CLEMENTE, CALIFORNIA, CERTIFYING ADDENDUM NO. 6 TO THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE MARBLEHEAD COASTAL SPECIFIC PLAN (SCH NO. 1995091037) PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AND APPROVING ZONING AMENDMENT ZA25-362 TO AMEND SECTION 502(V)(D) OF THE MARBLEHEAD COASTAL SPECIFIC PLAN TO ALLOW A HOTEL WITH THE SAME HEIGHT EXCEPTION GRANTED TO THE THEATER, FOR A MAXIMUM BUILDING HEIGHT OF 55 FEET TO THE PLATE LINE AND 62 FEET TO THE TOP OF THE ROOF OR HIGHEST PROJECTION

WHEREAS, on June 23, 1998, the City Council certified the Final Environmental Impact Report (FEIR) for the Marblehead Coastal Specific Plan (MCSP) (State Clearing House (SCH) No. 1995091037); and

WHEREAS, on August 5, 1998, the City Council approved General Plan Amendment 95-01, Specific Plan 95-02, Tentative Tract Map (TTM) 8817, Site Plan Permit (SPP) 97-16, and a Development Agreement; and

WHEREAS, on July 7, 1999, the City Council approved Site Plan Permit 99-16, Conditional Use Permit 99-17, and Sign Exception Permit 99-18, revising the commercial portion of the project to consist of 700,140 gross square feet of commercial uses, including 443,860 SF of specialty retail, 176,232 SF of entertainment, and 80,048 SF of general retail; and

WHEREAS, on April 9, 2003, the California Coastal Commission (CCC) conditionally approved the Marblehead Coastal project, while acknowledging that most, but not all, of the property lies within the Coastal Zone. Land outside of the Coastal Zone, including the subject site (Building 15), does not fall under CCC jurisdiction. The plan approved by the CCC incorporated conditions that preserved additional environmentally sensitive habitat areas, set development back from preserved areas, required substantial restoration and enhancement of degraded open space, reduced the number of residential lots from 424 to 313, and approved 141,500 square feet of commercial space within the Coastal Zone; and

WHEREAS, on September 16, 2003, the City Council approved an Amendment to TTM 8817 to reconcile differences between the CCC approval and the City's prior approval; and

WHEREAS, on July 20, 2004, the City Council adopted Resolution 04-61, which certified Addendum No. 5 to FEIR 95-01 and approved an amendment to commercial Site

Plan Permit 99-16, including the addition of a hotel and conference center; and

WHEREAS, on June 25, 2025, the City Council adopted Resolution 25-085, which, among other things, directed staff to initiate an amendment to the Marblehead Coastal Specific Plan and carry out required environmental review to establish an additional height exception for the hotel building on the Outlets property consistent with height allowances for the other landmark structures, the theater building, clock tower, and the parking structure. Resolution 25-085 further directed that the proposed amendment bypass the Planning Commission review process and be brought directly to the City Council for consideration and action; and

WHEREAS, this Ordinance (Ordinance) amends Section 502 (V)(D) within the Marblehead Coastal Specific Plan (MCSP) to effectuate the Project and the Council's directives on the same; and

WHEREAS, the City of San Clemente has prepared Addendum No. 6 to the certified MCSP FEIR to evaluate the proposed modification to MCSP Section 502(V)(D) through Zoning Amendment ZA25-362, which would designate the hotel as eligible for the same maximum height exception currently provided for the theater, clock tower, and parking structure; and

WHEREAS, pursuant to CEQA Guidelines Sections 15162 and 15164, the City as Lead Agency has determined that the proposed modification would not result in new significant environmental effects or substantially more severe impacts than those previously analyzed in the certified FEIR, and no new information has been disclosed indicating the potential for new or more severe impacts; and

WHEREAS, the City has further determined that the Addendum demonstrates consistency with the Centennial General Plan, including policies that encourage visitor-serving lodging near freeway interchanges, preserve public view corridors, and ensure compatibility with community character.

NOW, THEREFORE, the City Council of the City of San Clemente does hereby find, determine and resolve as follows:

SECTION 1. Incorporation of Recitals. The City Council hereby finds that all of the facts in the Recitals are true and correct and are incorporated and adopted as findings of the City Council as fully set forth in this Ordinance.

SECTION 2. CEQA Findings. The City Council hereby finds, based on substantial evidence in the record as a whole, that:

A. As demonstrated in the analysis of Addendum No. 6 to the Final Environmental Impact Report for the Marblehead Coastal Specific Plan (SCH No. 1995091037), the proposed modification would not result in new significant environmental effects.
B. The proposed modification would not substantially increase the severity of previously identified significant effects.

C. No new information, which was not known and could not have been known at the time the Final Environmental Impact Report was certified as complete, has become available that shows the potential for any new or more severe impacts than those already analyzed in the Final Environmental Impact Report.
D. No new mitigation measures or alternatives are required.
E. An Addendum is the appropriate environmental document under CEQA Guidelines Section 15164.

SECTION 3. Certification of Addendum No. 6. The City Council hereby certifies Addendum No. 6 to the Marblehead Coastal Specific Plan Final EIR (SCH No. 1995091037).

SECTION 4. Based on the findings in the addendum and in accordance with CEQA Guidelines Sections 15162 and 15164, no subsequent or supplemental Environmental Impact Report or Mitigated Negative Declaration is required for the proposed modifications.

SECTION 5. Specific Plan Amendment Findings. With respect to ZA 25-362, the City Council finds the following with respect to the amendment to the MCSP in accordance with the required findings enumerated within SCMC 17.16.030(G):

A. The proposed specific plan or specific plan amendment is consistent with the goals, objectives, policies, and programs of the General Plan, and is necessary and desirable to implement the provisions of the General Plan, in that:
    1. The General Plan's Land Use Element and Urban Design Element identify public views as resources of community importance, and Policy UD-2.05 and Policy UD-5.14 require new construction and building design to preserve designated public view corridors. The proposed hotel height exception does not alter public view corridors from West Avenida Vista Hermosa, Avenida Pico, Camino Capistrano, or the El Camino Real Bluff trail, which remain the focus of the MCSP's designated vista points. While some private views from inland neighborhoods may experience obstruction, the Final EIR's aesthetics analysis prioritized public views, which remains consistent with City policies to preserve public view corridors.
    2. The proposed height exception would remain consistent with the City's scenic and visual quality objectives for quality urban design and aesthetic resource preservation, as described in the General Plan's Land Use Element and Urban Design Element, and the modification would not alter a public view corridor.
    3. The proposed modification would also remain consistent with the goals and policies of the General Plan's Mobility and Complete Streets Element requiring new development to maintain adequate circulation and multimodal access (e.g., Policy M-1.01, M-1.19, M-1.25).
    4. Development of an approved hotel utilizing the height exception would remain subject to the City's standard noise control ordinances (i.e., San Clemente Municipal Code Chapter 8.48), as well as General Plan Safety Element policies to control ambient and stationary noise

conditions, including entertainment-related noise on residential and other sensitive uses (i.e., Policy S-4.01 and Policy S-4.08)

B. The uses proposed in the specific plan or specific plan amendment are compatible with adjacent uses and properties, in that:
    1. No changes of use are proposed.
    2. Hotels are an existing conditionally permitted use within the MCSP.
C. The proposed specific plan or specific plan amendment will not adversely affect the public health, safety and welfare, in that:
    1. Modification of MCSP Section 502 (V)(D) to allow the hotel (Approved Site Plan Building 15) to be permitted with an exception to the maximum building height, similar to the theater, would not result in any new or more severe significant Land Use impacts not previously addressed in the Final EIR.
    2. The proposed modification would stay consistent with the purpose and intended use of the Regional Commercial designation. The modification would not conflict with any of the goals and objectives of the MCSP. The additional proposed height for the hotel would be the same as the current allowable exception for a theater and clocktower. This additional exception would support the City's intent of having a theater and hotel as the landmark features of the MCSP's regional commercial center.
    3. Construction of the approved hotel under the proposed modification would continue to be subject to the City's updated policies intended to minimize noise exposure. The project would not create any new significant noise impacts and would not increase the severity of previously identified impacts presented in the Final EIR.
    4. The height exception for the hotel structure would not create any significant new aesthetic resource impacts or significant changes to the impact conclusions presented in the Final EIR. Impacts to viewsheds from the height exception would be of equivalent magnitude to those identified in the Final EIR.
D. The proposed specific plan amendment will not create internal inconsistencies within the specific plan, in that:
    1. Only MCSP Section 502 (V)(D) is being amended, and there are no further references to MCSP Regional Commercial development standards that would conflict with this Section.

SECTION 6. Approval of Zoning Amendment ZA25-362. The City Council hereby approves Zoning Amendment ZA25-362 to amend MCSP Section 502(V)(D) to read as follows (new text **bolded and underlined**):

"D. Maximum Height – The maximum height to the top of the roof or highest projection shall be 45 feet. The maximum average height to the plate line of a building shall be 37 feet. Exceptions to this maximum building height are permitted for a **hotel [Approved Site Plan defines as Building 15],** theater [Approved Site Plan defines as Building 22], and parking structure in the entertainment portion of the regional commercial center. The maximum average height to the plate line of a parking structure shall be 40 feet and to the plate line of a **hotel and** theater shall be 55 feet. The maximum height to the highest

projection of an architectural feature for a **hotel,** theater or clock tower is 62 feet."

SECTION 7. If any section, subsection, subdivision, paragraph, sentence, clause, or phrase of this Ordinance, or any part thereof, is for any reason held to be invalid, such decision shall not offset the validity of the remaining portions of this Ordinance or any part thereof. The City Council hereby declares that it would have passed each section, subsection, subdivision, paragraph, sentence, clause, or phrase thereof, irrespective of the fact that any one or more sections, subsections, subdivisions, paragraphs, sentences, clauses, or phrases be declared invalid.

SECTION 8. This Ordinance shall take effect thirty (30) days from the date of its passage. The City Clerk shall certify to the passage of this ordinance and cause the same to be published as required by law, and the same shall take effect as provided by law.

APPROVED AND ADOPTED this _____ day of _____, _____.

ATTEST:

| | |
|---|---|
| _____ | _____ |
| City Clerk of the City of San Clemente, California | Steve Knoblock, Mayor of the City of San Clemente, California |

STATE OF CALIFORNIA )
COUNTY OF ORANGE ) §
CITY OF SAN CLEMENTE )

I, LAURA CAMPAGNOLO, City Clerk of the City of San Clemente, California, hereby certify that Ordinance No. 1795 having been regularly introduced at the meeting of _____, was again introduced, the reading in full thereof unanimously waived, and duly passed and adopted at a regular meeting of the City Council held on the _____day of _____, _____, and said ordinance was adopted by the following vote:

AYES:

NOES:

ABSENT:

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the City of San Clemente, California, this _____ day of _____, _____.

_____
CITY CLERK of the City of
San Clemente, California

Approved as to form:

_____
Elizabeth A. Mitchell, City Attorney

RESOLUTION NO. 25-137

AN RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SAN CLEMENTE APPROVING PUBLIC HEARING PROJECT 25-343 TO AMEND COMMERCIAL SITE PLAN PERMIT (SPP) 99-16 AND CONDITIONAL USE PERMIT (CUP) 99-17 TO MODIFY THE PREVIOUSLY APPROVED HOTEL AT 401 W. AVENIDA VISTA HERMOSA TO ALLOW FOR AN INCREASE IN HEIGHT FROM 45 FEET TO 62 FEET TO INCORPORATE A ROOFTOP RESTAURANT WITH OUTDOOR DINING; AND FINDING THAT ADDENDUM NO. 6 TO THE MCSP FINAL ENVIRONMENTAL IMPACT REPORT DEMONSTRATES NO NEW SIGNIFICANT IMPACTS AND THAT NO FURTHER ENVIRONMENTAL REVIEW IS NEEDED, CONSISTENT WITH CEQA GUIDELINES §15162 AND §15183

WHEREAS, on June 23, 1998, the City Council certified the Final Environmental Impact Report (FEIR) for the Marblehead Coastal Specific Plan (MCSP) (State Clearing House [SCH] No. 1995091037); and

WHEREAS, on August 5, 1998, the City Council approved General Plan Amendment 95-01, Specific Plan 95-02, Tentative Tract Map (TTM) 8817, Site Plan Permit (SPP) 97-16, and a Development Agreement; and

WHEREAS, on July 7, 1999, the City Council approved Site Plan Permit 99-16, Conditional Use Permit 99-17, and Sign Exception Permit 99-18, revising the commercial portion of the project to consist of 700,140 gross square feet of commercial uses, including 443,860 SF of specialty retail, 176,232 SF of entertainment, and 80,048 SF of general retail; and

WHEREAS, on April 9, 2003, the California Coastal Commission (CCC) conditionally approved the Marblehead Coastal project, acknowledging that most, but not all, of the property lies within the Coastal Zone. Land outside of the Coastal Zone, including the subject site, does not fall under CCC jurisdiction. The plan approved by the CCC incorporated requirements that preserved additional environmentally sensitive habitat areas, set development back from preserved areas, required substantial restoration and enhancement of degraded open space, reduced the number of residential lots from 424 to 313, and approved 141,500 square feet of commercial space within the Coastal Zone; and

WHEREAS, on September 16, 2003, the City Council approved an Amendment to TTM 8817 to reconcile differences between the CCC approval and the City's prior approval; and

WHEREAS, on July 20, 2004, the City Council adopted Resolution 04-61, which certified Addendum No. 5 to the MCSP Final Environmental Impact Report (FEIR) and approved an amendment to commercial Site Plan Permit 99-16, to include the addition of a hotel and conference center; and

WHEREAS, the 2004 approval denoted an anticipated maximum parking demand of 3,061 parking spaces for the entirety of the commercial site plan development, including 349 spaces for the hotel (211 for hotel rooms and 138 to support the conference center); and

WHEREAS, impacts of all parking spaces at the Outlets were fully analyzed in the Final EIR for the original project, including 3,718 parking spaces; and subsequent amendments and addenda analyzed alterations to the parking supply finally arriving at a count of 3,264 as approved by the Amended Commercial Site Plan 99-16 in 2004, rendering a surplus of 203 spaces; and

WHEREAS, the City and Coastal Commission approved conversion of buildings 9-11 from retail and restaurant use to medical use in 2020 and 2022 respectively, resulting in an additional surplus of 34 parking spaces; and

WHEREAS, the City approved a substantial conformance plan set in January of 2019 (B19-099) for a four-story hotel and conference center comprising 133,515 square feet with 130 guest rooms, a conference center, lobby restaurant, and outdoor pool, with a total parking demand of 309 spaces; and

WHEREAS, this 2025 proposed amendment would allow an increase in height from 45 feet to 62 feet to establish a roof deck restaurant, with an updated project parking demand of 356 parking spaces; and

WHEREAS, the net increase in parking demand (47 spaces) is less than the available surplus of 237 spaces; and

WHEREAS, on June 25, 2025, the City Council adopted Resolution 25-085, which, among other things, directed staff to initiate an amendment to the MCSP and carry out required environmental review to establish additional height allowances for the hotel building on the Outlets property consistent with height allowances for other landmark structures, including the theater building; and

WHEREAS, the City of San Clemente has prepared Addendum No. 6 to the certified MCSP FEIR to evaluate the proposed modification to MCSP Section 502(V)(D) through Zoning Amendment ZA25-362, which would designate the hotel as eligible for the same maximum 62-foot height exception currently provided for the theater and clock tower; and

WHEREAS, pursuant to CEQA Guidelines Sections 15162 and 15164, the City as Lead Agency has determined that the proposed modification would not result in new significant environmental effects or substantially more severe impacts than those previously analyzed in the certified FEIR; and

WHEREAS, the City has further determined that the Addendum demonstrates

consistency with the Centennial General Plan, including policies that encourage visitor-serving lodging near freeway interchanges, preserve public view corridors, and ensure compatibility with community character; and

WHEREAS, on September 16, 2025, the City Council introduced Ordinance No. 1795 (Ordinance) to certify Addendum No. 6 to the Marblehead Coastal Specific Plan Final EIR (SCH No. 1995091037) and to amend Section 502 (V)(D) within the Marblehead Coastal Specific Plan (MCSP) to effectuate the Project and the City Council's directives on the same; and

WHEREAS, on December 3, 2019, an application was submitted by Lodge at San Clemente, LLC, 4100 Macarthur Blvd 100, Newport Beach, CA, 92660 to request to amend previously approved commercial Site Plan Permit 99-16 and Conditional Use Permit 99-17 to increase the height of the previously approved hotel to incorporate a roof top restaurant with outdoor dining; and

WHEREAS, the City's Development Management Team reviewed the proposed amended project for consistency with the General Plan policies and other applicable City ordinances and policies; and

WHEREAS, the Design Review Subcommittee reviewed the 2004 project between November 24, 2003, and June 7, 2004; and subsequently reviewed the amended project proposal on June 10, 2020; and

WHEREAS, on September 16, 2025, the City Council of the City of San Clemente held a duly noticed public hearing on the subject application in accordance with SCMC 17.12.180 (Applicant Requests to Change Approved Applications) and considered evidence presented by City staff, the project applicant and other interested parties.

NOW, THEREFORE, the City Council of the City of San Clemente does hereby find, determine and resolve as follows:

SECTION 1. Incorporation of Recitals. The City Council hereby finds that all of the facts in the Recitals are true and correct and are incorporated fully herein and adopted as findings of the City Council.

SECTION 2. CEQA Findings. The City Council hereby finds, based on substantial evidence in the record as a whole, that as demonstrated in the analysis of Addendum No. 6 to the Final Environmental Impact Report for the Marblehead Coastal Specific Plan (SCH No. 1995091037), the proposed modification would not result in new significant environmental effects. The proposed modification would also not substantially increase the severity of previously identified significant effects, and no new mitigation measures or alternatives are required. No new information, not known at the time of the prior analyses, has been disclosed that shows the potential for any new or more severe impacts. An Addendum is therefore the appropriate environmental document under CEQA Guidelines Section 15164. Following the City Council's certification of Addendum No. 6 to the Marblehead Coastal Specific Plan FEIR (SCH No. 1995091037), no further environmental review is required, consistent with CEQA Guidelines Sections 15162.

The City Council hereby finds, based on substantial evidence in the record as a whole, that, as demonstrated in the analysis within Addendum No. 6 to the Final Environmental Impact Report for the Marblehead Coastal Specific Plan (SCH No. 1995091037), the project also qualifies for streamlined review under CEQA Guidelines section 15183. Section 15183 allows streamlined CEQA review for projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was previously certified. Section 15183 requires the lead agency to determine whether there are project-specific significant effects which are peculiar to the project or its site that were not analyzed as significant effects in the prior EIR; that are potentially significant off-site impacts and cumulative impacts that were not discussed in the prior EIR; or that are previously identified significant effects that, as a result of substantial new information that was not known at the time the EIR was certified, will have more severe adverse impacts than discussed in the prior EIR. In this case, the City Council hereby finds, based on substantial evidence in the record as a whole, that the project is precisely the kind of project envisioned in Addendum No. 6 to the FEIR, which was adopted per current general plan, community plan, and zoning requirements. The project description assessed in Addendum No. 6 to the 1998 EIR included the development of a hotel and conference center within the Marblehead Coastal Specific Plan, and the increase in height to 62 feet to accommodate a rooftop restaurant and elevator towers will not produce any new or more severe impacts that were not discussed in the FEIR, in Addendum No. 6 to the FEIR, and other prior analyses.

SECTION 3. Amendment Findings and Conditions. With respect to PHP25-343 to amend Commercial Site Plan Permit (SPP) 99-16 and Conditional Use Permit (CUP) 99-17, the City Council affirms the findings made within Resolution 04-61, with the following revisions (added text is in bold, underline; deleted text is in strike-through):

A. Section 2 (F)(1) is revised to state: "The proposed commercial uses comply with the maximum 45-foot height limit of the Marblehead Specific Plan Regional Commercial zone. The theater **and hotel comply** ~~complies~~ with the maximum 55-foot height limit and a maximum architectural projection of 62-feet."

B. Section 2 (E)(4) is added to state: "Addendum 6 was prepared to evaluate an increase in allowable height for the hotel use and demonstrates that the proposed modification is consistent with the goals and policies of the City of San Clemente Centennial General Plan (City of San Clemente, 2014). The General Plan encourages visitor-serving uses such as lodging within the Marblehead Coastal commercial area (Policy ED-4.05), and requires new development to be compatible with community character (Policy LU-2.01). The General Plan also places strong emphasis on protection of public views (Policy UD-2.05 and Policy UD-5.14). As discussed in Addendum Chapter 3 and Chapter 4, the proposed height exception for the hotel would remain consistent with these policies, since it applies to a previously approved visitor-serving lodging use, does not alter approved setbacks or intensity, and would be subject to design review procedures that ensure compliance with the City's Spanish Colonial Revival architectural standards.

C. Section 2 (A)(4) is added to state: "The project is consistent with General Plan Policy ED-4.05, which encourages visitor-serving uses such as lodging within the Marblehead Coastal commercial area; Policy LU-2.01, which emphasizes compatibility of new development with community character; and is consistent with the Marblehead Coastal Specific Plan goal.

D. Section 2 (A)(5) is added to state: "The project directly achieves the first four objectives of the Marblehead Coastal Specific Plan which are to:

1. Provide for a variety of land uses within the Specific Plan area capable of generating significant new tax revenues to the City.
2. Promote Regional Commercial Uses to Generate Sales Tax Revenues.
3. Enhance Existing and Future Public Access to the Coast.
4. Enhance Future Public Recreation Opportunities along the Shoreline by Providing Upland Recreation and Visitor-Serving Areas Designed to Support Recreational Use of Public Beaches in the City.

E. The following Conditions of Approval are appended to those existing conditions enumerated under Exhibit 1 of Resolution 04-61:

1. (Condition 86): **Planning: Roof Deck Noise and Lighting**. Amplified noise or entertainment are not requested or approved through this resolution. Should the applicant, in the future, wish to provide amplified sound, live entertainment, or different lighting systems that require additional discretionary review, the property owner shall submit a future amendment for review by the Planning Commission, not requiring approval by the City Council, unless appealed.

2. (Condition 87): **Orange County Fire Authority (OCFA) Plan Submittal:** The applicant or responsible party shall submit the plan(s) listed below to the OCFA for review. Approval shall be obtained on each plan prior to the specified event:
    i. Prior to OCFA clearance of a final map or issuance of a precise grading permit or a building permit, if a grading permit is not required:
        1. fire master plan (service code PR145)
        2. alternative methods and materials (AM&M) request (PR910)
    ii. Prior to issuance of a building permit:
        1. architectural for Group R-1 Occupancy (service codes PR268) and for Group A-2/A-3 Occupancies (service code PR200)
        2. tanks storing hazardous materials (service codes PR300), if a diesel generator will be included in the scope of work
        3. battery (service code PR375), if a back-up battery

system will be included in the scope of work
4. emergency responder radio system design (service code PR928); this submittal may be deferred when acceptable to the Building Department, but the required conduit must be installed prior to concealing interior construction
5. underground piping for private hydrants and fire sprinkler systems (service code PR470-PR475)

iii. Prior to concealing interior construction:
1. fire alarm system (service code PR530)
2. fire sprinkler system (service codes PR425).
3. hood and duct extinguishing system (service code PR335)

iv. Prior to occupancy:
1. emergency responder radio system testing (service code PR928)

3. (Condition 88): **Emergency Responder Digital Radio System**: An emergency responder digital radio system shall be provided in this structure. Refer to CFC 510 and the OCC/OCFA DAS/BDA guidelines (available at ocfa.org) for requirements. Evidence of compliance with emergency responder digital radio system design and performance criteria shall be provided prior to occupancy.

4. (Condition 89): **Temporary/Final Occupancy Inspections:** Prior to issuance of temporary or final certificate of occupancy, all OCFA inspections shall be completed to the satisfaction of the OCFA inspector and be in substantial compliance with codes and standards applicable to the project and commensurate with the type of occupancy (temporary or final) requested. Inspections shall be scheduled at least five days in advance by calling OCFA Inspection Scheduling at 714-573-6150.

SECTION 4. Approval of PHP25-343. The City Council hereby approves Zoning Amendment PHP25-343 to amend Commercial Site Plan Permit (SPP) 99-16 and Conditional Use Permit (CUP) 99-17 to modify the previously approved hotel at 401 W. Avenida Vista Hermosa to allow for an increase in height to 62 feet to incorporate a rooftop restaurant with outdoor dining subject to the above conditions of approval and those set forth in Exhibit 1 of Resolution 04-61.

SECTION 5. The City Clerk shall certify to the passage and adoption of this resolution and enter it into the book of original resolutions.

PASSED AND ADOPTED this 16th day of September, 2025.

ATTEST:

City Clerk of the City of
San Clemente, California

Steve Knoblock, Mayor of the
City of San Clemente, California

STATE OF CALIFORNIA )
COUNTY OF ORANGE ) §
CITY OF SAN CLEMENTE )

I, LAURA CAMPAGNOLO, City Clerk of the City of San Clemente, California, do hereby certify that Resolution No. 25-137 was adopted at a regular meeting of the City Council of the City of San Clemente held on the 16th day of September, 2025, by the following vote:

AYES: CABRAL, ENMEIER, LOEFFLER, MAYOR KNOBLOCK

NOES: WU

ABSENT: NONE

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the City of San Clemente, California, this 24th day of September, 2025.

CITY CLERK of the City of
San Clemente, California

Approved as to form:

Elizabeth A. Mitchell, City Attorney

# Marblehead Coastal Specific Plan
# Final EIR Addendum No. 6

## SCH Number 1995091037

***Prepared for***

**City of San Clemente**
**Community Development Department**

***Submitted by***

Aspen environmental group

**September 2025**

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# 1. INTRODUCTION AND PURPOSE

## 1.1. CEQA Compliance

The Marblehead Coastal Final Environmental Impact Report (EIR) was certified by the City of San Clemente (City) on June 23, 1998, which was followed by the City's approval of the Marblehead Coastal Specific Plan (MCSP) on August 5, 1998.

This addendum to the previously certified EIR for the MCSP (SCH No. 1995091037) has been prepared in accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15164 which requires a Lead Agency to revise a certified EIR to accurately reflect any changes or additions to the project, changes in conditions under which the project is undertaken, or to add new information. In accordance with CEQA Guidelines Section 15162, changes to the approved project addressed in this addendum would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects, nor any new information indicating as such, as discussed herein.

The MCSP is both a planning and regulatory document that implements the goals, policies, and objectives of the City of San Clemente General Plan while providing guidelines and regulations for development within the MCSP planning area. The MCSP EIR is a programmatic document that may be used by the City to tier the environmental analyses of future projects under the MCSP that require discretionary review. Proposed modifications to planned development presented in the MCSP (i.e., land use designations, design guidelines, development standards) would require updates to the MCSP EIR or preparation of a subsequent or supplemental EIR.

Prior to any development, the City must approve a comprehensive site plan specific to proposed residential and commercial uses within the MCSP. In 1999, the City approved a comprehensive site plan (Site Plan Permit 99-16) for the MCSP's regional commercial center (i.e., Marblehead Coastal Promenade) (City of San Clemente, 1999). The site plan permit was amended in 2004 to allow development of a retail outlet, restaurants, theater, and hotel and conference center (City of San Clemente, 2004). Since its initial approval, the hotel design was modified to include a roof deck, which would increase the building's height above the MCSP's maximum height requirements within a regional commercial center. The MCSP includes exceptions to this maximum height requirement for a theater, parking structure, and clock tower.

In deciding whether a subsequent or supplemental EIR is necessary or if an addendum is appropriate, the standard of review is whether the record as a whole contains substantial evidence to support a determination that the changes in the project or its circumstances are substantial enough to make major modifications to the EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects (see CEQA Guidelines Section 15162). A subsequent or supplemental EIR may also be required if new information, not known at the time the prior EIR was certified, becomes available and shows new or more severe significant environmental impacts. If the project would not cause new or more severe impacts, and only minor technical changes are required, the lead agency may adopt an addendum (see CEQA Guidelines Section 15164).

The City has determined that including the hotel as an additional exception to the maximum height requirement within a regional commercial center requires only clarifications to the MCSP Final EIR and warrants preparation of an addendum, not a subsequent or supplemental EIR. The information presented in this 2025 Addendum demonstrates that the impacts and mitigation requirements identified in the 1998 Final EIR remain substantively unchanged by the proposed modification. This supports the finding that the proposed modification does not raise any new issues and does not exceed the level of impacts identified in the certified MCSP Final EIR.

This 2025 Addendum also demonstrates that the proposed modification is consistent with the goals and policies of the City of San Clemente Centennial General Plan (City of San Clemente, 2014). The General Plan encourages visitor-serving uses such as lodging within the Marblehead Coastal commercial area (Policy ED-4.05), and requires new development to be compatible with community character (Policy LU-2.01). The General Plan also places strong emphasis on protection of public views (Policy UD-2.05 and Policy UD-5.14). As discussed in Addendum Chapter 3 and Chapter 4, the proposed height exception for the hotel would remain consistent with these policies, since it applies to a previously approved visitor-serving lodging use, does not alter approved setbacks or intensity, and would be subject to design review procedures that ensure compliance with the City's Spanish Colonial Revival architectural standards.

The following sections provide additional detail regarding the proposed modification and findings.

## 1.2. Background and History

### Certification of Marblehead Coastal Specific Plan Final EIR 95-01 (SCH No. 1995091037)

On June 23, 1998, the City Council certified the MCSP Final EIR 95-01 (SCH No. 1995091037) and concurrently adopted Findings of Fact, a Statement of Overriding Considerations, and a Mitigation Monitoring and Reporting Program (City of San Clemente, 1998c). The MCSP authorized 116.7 acres of residential use, 60.4 acres of regional serving commercial use, 1.0 acre of coastal commercial use, 9.4 acres of public open space, 49.5 acres of private open space, and 13.6 acres of circulation facilities (City of San Clemente 1998a).

The Final EIR analyzed potential environmental impacts to 13 issue areas and determined that, with the exception of Air Quality, no significant impacts would occur following implementation of mitigation measures and enforcement of applicable policies and standards prescribed in the City of San Clemente Municipal Code. The Final EIR determined that Air Quality impacts associated with short- and long-term air-quality emissions would remain significant and unavoidable despite implementation of recommended mitigation measures.

Implementation of the MCSP required approval of the following discretionary actions either by the City Council or the California Coastal Commission:

- General Plan Amendment 96-01
- Specific Plan 95-02
- Coastal Development Permit
- Development Agreement
- Tentative Tract Map No. 8817
- Residential Site Plan Permit 97-16
- Commercial Site Plan Permit 99-16
- Conditional Use Permit 99-17
- Sign Exception Permit 99-18

### Addendum No. 1 to MCSP Final EIR 95-01, July 1998

Addendum No. 1 addressed revisions to the MCSP that were requested by the City Council to allow up to 20 acres of multiple-family residential as an optional land use within the Regional Commercial (RC) component of the MCSP. The remaining 40.4 acres of the RC area remained designated for regional

commercial uses at a 0.35 Floor Area Ratio (FAR) (i.e., 615,000 square feet). None of the other land use designations within the MCSP were affected by the revision.

### Addendum No. 2 to MCSP Final EIR 95-01, February 2000

Addendum No. 2 addressed modifications to Tentative Tract Map No. 8817 and to Residential Site Plan 97-16 that allowed for the preservation of additional wetland habitat through the following changes:

- Reduction of 10 residential lots (revised total of 424 residential units);
- Reduction of the average single-family lot size by 119 square feet (revised total of 7,017 square feet);
- Reduction of 1.1 acres of commercial center net acreage (revised total of 59.3 acres); and
- Reduction of 54 commercial parking spaces (revised total of 3,664 spaces).

The proposed modification allowed an additional 2.92 acres of existing wetland habitat to be preserved, for a revised total of 4.82 acres of wetland habitat within the MCSP.

### Addendum No. 3 to MCSP Final EIR 95-01, August 2003

Addendum No. 3 addressed additional modifications to Tentative Tract Map No. 8817 to respond to concerns expressed by the California Coastal Commission. The modifications reduced the development footprint from canyon and drainage areas and away from bluffs. Changes included the following:

- Reduction of 111 residential lots (revised total of 313 residential lots); and
- Reduction of 7.7 acres of commercial center net acreage (revised total of 51.6 acres).

Under the proposed modification, the MCSP increased the total acreage of preserved areas to include 7.4 acres of wetland habitat, 125.88 acres of open space, and 82.31 acres of upland habitat within the coastal zone.

### Addendum No. 4 to MCSP Final EIR 95-01, December 2003

Addendum No. 4 addressed proposed refinements to the MCSP's Open Space component as defined in the Marblehead Coastal Project Public Parks and Trails Master Plan (PPTMP), which was approved by the City Council on March 2, 2004. The PPTMP provided detail on specific amenities to be incorporated into the MCSP's public park parcels, open space parcels, and trail network. The proposed refinements were specific to Sports Park, Pico Park, Trident Canyon Park, East Branch Park, and Coastal Sage Scrub Habitat.

### Addendum No. 5 to MCSP Final EIR 95-01, May 2004

Addendum No. 5 addressed additional modifications to Tentative Tract Map No. 8817, Residential Site Plan 97-16, and Commercial Site Plan 99-16. Changes included the following:

- Increase in size of Sports Park parking lot to accommodate 73 additional parking spaces (revised total of 158 parking spaces);
- Shift residential lots slightly east and north (in the neighborhood adjacent to Shorecliffs Middle School) to establish an open space ocean view corridor at the southern terminus of Street RRRR;
- Public trail extensions and improvements;
- Reduction of 33,709 square feet of commercial use (revised total of 641,534 square feet);
- Modification of commercial parking structure to accommodate an additional 606 parking spaces (revised total of 1,299 parking spaces); and

- Reorientation of the four-story hotel to be parallel with the Central Canyon (in lieu of its previously proposed location parallel to the freeway).

## 1.3. Incorporation by Reference

As stated in CEQA Guidelines Sections 15150(a), an EIR may incorporate by reference all or portions of another document that has been made part of the public record. This approach is suitable for public agencies to reduce delay and paperwork (CEQA Guidelines Section 15006(t)). All documents pertaining to the approval and adoption of the MCSP are hereby incorporated by reference and made a part hereof. The documents incorporated by reference, which will be cited as appropriate throughout this EIR Addendum, include the following:

- City of San Clemente. Final Environmental Impact Report for the Marblehead Coastal General Plan Amendment 96-01, Specific Plan No. 95-02, Tentative Tract Map, Site Plans, Conditional Use Permit, and Sign Exception Permit. Certified June 23, 1998
- City of San Clemente. Marblehead Coastal Specific Plan. Adopted August 5, 1998. Amended December 6, 2022
- City of San Clemente. City of San Clemente Centennial General Plan. Adopted February 4, 2014. Amended December 20, 2016

# 2. DESCRIPTION OF THE PROPOSED PROJECT

## 2.1. Project Location

The 248-acre planning area for the MCSP is located in the western portion of the City of San Clemente that is bounded by the Pacific Ocean to the southwest, the Interstate 5 Freeway (I-5) to the northeast, and other City neighborhoods to the northwest and southeast. The project site is a 1.7-acre parcel that is within the MCSP's Regional Commercial (RC) designation southeast of the West Avenida Vista Hermosa/I-5 interchange. Figure 2-1 illustrates the location of the project site.

**Figure 2-1. Project Location**




## 2.2. Project Description

The proposed project involves a modification to the development standards and permissible exceptions within the MCSP's RC designation. The RC designation conditionally permits visitor-serving lodging such as hotels pursuant to Section 106 of Chapter 1 and Table 5-3 of the MCSP (City of San Clemente, 1998a). In 2004, the City approved a hotel development on a 1.7-acre parcel (Assessor's Parcel Number [APN] 691-422-04) that would have a maximum building height of 37 feet to the plate line and 45 feet to the top of the roof or highest projection, consistent with RC standards specified in MCSP Section 502 (V)(D) (City of San Clemente, 1998a and 2004). MCSP Section 502 (V)(D) also specifies that certain buildings are permitted with an exception to the standard height limit, allowing increased heights for the theater and parking structure. The proposed project would designate the hotel use, expected to be developed on the 1.7-acre parcel ("project site"), as eligible for the same height exception that is granted to the theater,

which would be a maximum building height of 55 feet to the plate line and 62 feet to the top of the roof or highest projection—a maximum potential height increase of 17 feet.

The proposed project would modify MCSP Section 502 (V)(D) with insertion of the bold and underlined text shown below.

> D. Maximum Height - The maximum height to the top of the roof or highest projection shall be 45 feet. The maximum average height to the plate line of a building shall be 37 feet. Exceptions to this maximum building height are permitted for a **hotel,** theater [Approved Site Plan defines as Building 22] and parking structure in the entertainment portion of the regional commercial center. The maximum average height to the plateline of a parking structure shall be 40 feet and to the plateline of a **hotel and** theater shall be 55 feet. The maximum height to the highest projection of an architectural feature for a **hotel,** theater or clocktower is 62 feet.

As part of the San Clemente City Council's 2004 approval of the hotel (City Council Resolution No. 04-61), the City determined that the proposed hotel and theater, identified as Building 15 and Building 22 in the MCSP's Approved Site Plan, are intended to be architectural landmarks within the MCSP (City of San Clemente, 2004). Adding the hotel use as eligible for the maximum height exception is consistent with the existing height exception provided for the theater in MCSP Section 502 (V)(D) (City of San Clemente, 1998a) and aligns with the City's expectation of these buildings functioning equally as the anchoring architectural landmarks of the property.

# 3. ENVIRONMENTAL ANALYSIS

This chapter will identify the resources evaluated in the MCSP Final EIR that may experience potential impacts from the proposed project. Any potential changes to the type or severity of the impact that was evaluated in the Final EIR will be discussed in detail. All other resources evaluated in the Final EIR whose analysis would not be affected by the proposed project are discussed in Addendum Chapter 4.

## 3.1. Land Use and Related Planning

### 3.1.1. Baseline Conditions

The proposed project site is within an RC zoned component of the MCSP, which allows for general retail commercial, factory outlet stores, promotional and specialty retail, restaurants, entertainment, professional offices, financial institutions, lodging, and similar regional serving uses (City of San Clemente, 1998a). The project site is at the north end of a regional commercial center that includes a Chick fil-A restaurant to the northwest, an urgent care medical facility to the southwest, the Outlets of San Clemente (outlets) approximately 500 feet to the southeast, and parking lots supporting each of these businesses. A 5.8-acre undeveloped parcel separates the project site from the outlets. The entirety of the project site is outside of the coastal zone.

The MCSP's RC designation is intended to "create a place for land uses that are appropriate for freeway accessibility, create needed commercial stability in the community, and establish an outstanding image for San Clemente and surrounding residential areas" (City of San Clemente, 1998a). As stated in MCSP Section 502 (V), the RC designated area must be developed as part of a comprehensive site plan for the MCSP's regional commercial center that is subject to MCSP guidelines, regulations, and development standards. The development standards for the RC designation are listed in Table 3-1.

**Table 3-1. Regional Commercial Development Standards**

| Development Standard | Definition |
|---|---|
| Minimum Lot Area | The minimum lot area for a Site Plan shall be a 51.5-acre comprehensive plan with uses as contained in Table 5-3 of the MCSP. |
| Maximum Floor Area Ratio | The maximum Floor Area Ratio (FAR) for the project area shall be 0.35. Individual parcels within a Site Plan Permit area need not comply with this FAR, as long as the overall Site Plan FAR does not exceed 0.35. |
| Maximum Project Area Coverage | The maximum project area coverage shall be 50%. Individual parcels within a Site Plan Permit need not comply with this maximum coverage, as long as the overall Site Plan coverage, including parking structures, does not exceed 50%. |
| Maximum Height | The maximum height to the top of the roof or highest projection shall be 45 feet. The maximum average height to the plateline of a building shall be 37 feet. Exceptions to this maximum building height are permitted for a theater [Approved Site Plan defines as Building 22] and parking structure in the entertainment portion of the regional commercial center. The maximum average height to the plateline of a parking structure shall be 40 feet and to the plateline of a theater shall be 55 feet. The maximum height to the highest projection of an architectural feature for a theater or clocktower is 62 feet. |

| Development Standard | Definition |
|---|---|
| Setbacks for Structures | The minimum average setback of all buildings with frontage along arterial streets, including those set back towards the rear of the commercial center (but directly visible from these streets), shall be 50 feet.<br>The minimum setback from the property line along I-5 (I-5 right-of-way) shall be 30 feet. For buildings with average platelines of up to 30 feet high (excluding architectural features such as towers) adjacent to Avenida Pico or Avenida Vista Hermosa, the minimum setback, as measured from right-of-way, shall be 30 feet. Architectural projections (such as architectural towers, arcades or trellises) may encroach to a maximum of 5 feet into the 30-foot minimum setback. |

Source: Section 502 (V) of the MCSP (City of San Clemente, 1998a)

In July 1999, the City Council approved a comprehensive site plan (Site Plan Permit 99-16) for construction of a regional commercial shopping center (i.e., Marblehead Coastal Promenade) within the MCSP's RC designated area (City of San Clemente, 1999). Condition of Approval No. 9 for the permit requires a business hotel with conference facilities to be sited at the northern portion of the commercial center.

Site Plan Permit 99-16 was amended in July 2004 to include a hotel for the project site, which is defined as Building 15 (City of San Clemente, 2004). The proposed hotel development was found to be consistent with the RC development standards. Condition of Approval No. 6 for the permit amendment includes a statement that the hotel is intended to be an architectural landmark with the theater. Condition No. 6 further states that if either the hotel or theater is not constructed, an alternative structure must be developed that can serve as an architectural landmark (City of San Clemente, 2004).

### 3.1.2. Summary of Final EIR Impact Conclusions

The MCSP Final EIR evaluated consistency of the Marblehead Coastal project with the goals and objectives of the San Clemente General Plan, as well as the compatibility of the project with surrounding land uses. The MCSP amended the City's General Plan to replace the Mixed Use designations with specific land use designations that would permit future development on the site. The MCSP established permitted uses and development standards to ensure the site would be developed in a consistent manner and conform to all provisions in the General Plan. The Final EIR determined that the MCSP remains substantially consistent with the objectives and policies of the General Plan Land Use Element as it would require development to incorporate a unified and distinctive character and would integrate parks, streets, walkways, and trails (City of San Clemente, 1998b).

The Final EIR also determined that the MCSP policies relating to the regional commercial design and access features do not conflict with existing or proposed uses near the project site. Furthermore, the compatibility of existing and future uses would not be compromised because the regional commercial component of the MCSP is separated from the existing residential development by open space buffers, proposed residential development, and setbacks. The Final EIR concluded that development of the RC component of the MCSP would not result in any significant impacts.

### 3.1.3. Consideration of Changes to Impact Conclusions

As stated in City Resolution 04-61, the theater and hotel are intended to be landmark features of the MCSP (City of San Clemente, 2004). A maximum height projection of 62 feet is permitted in an RC designation for an architectural feature associated with the theater. The proposed modification to the maximum allowable height for the hotel would be identical to the allowable height for the theater, and would be consistent with the intended use and design of the hotel and theater as architectural landmarks within the RC designation. Given that the RC designation already provides for this height exception to

accommodate architectural features, inclusion of the hotel in the maximum height exception would be a minor modification that would not alter the intent or application of the RC development standards (see Table 3-2). Furthermore, this minor modification would not conflict with any existing or proposed uses near the project site.

**Table 3-2. Consistency with Regional Commercial Development Standards**

| Development Standard | Consistency |
|---|---|
| Minimum Lot Area | **Consistent.** The hotel would be developed within the Approved Site Plan area for the MCSP's regional commercial center. No changes would be made to this development standard. |
| Maximum Floor Area Ratio | **Consistent.** The hotel would be developed within the Approved Site Plan area for the MCSP's regional commercial center. No changes would be made to this development standard. |
| Maximum Project Area Coverage | **Consistent.** The hotel would be developed within the Approved Site Plan area for the MCSP's regional commercial center. No changes would be made to this development standard. |
| Maximum Height | **Consistent.** The maximum height requested for the hotel is consistent with the maximum height allowed for the theater building. The theater and hotel are envisioned (per original approvals by the City) as the two landmarks structures of the Marblehead Coastal Promenade, suggesting that allowing the same height exception for both properties would be consistent with the goals for the overall development of the regional commercial center. |
| Setbacks for Structures | **Consistent.** The hotel would be developed within the Approved Site Plan area for the MCSP's regional commercial center, which complies with the minimum average setback of 50 feet for all buildings with frontage along a major arterial. No changes would be made to this development standard. |

Source: Section 502 (V) of the MCSP (City of San Clemente, 1998a)

The proposed modification is consistent with the City's 2014 Centennial General Plan. The General Plan's Land Use Element designates the project site as RC and describes the purpose of tourist-related commercial uses to attract and provide services to visitors. The General Plan Economic Development Element specifically encourages visitor-serving uses such as lodging within the Marblehead Coastal commercial area (Policy ED-4.05) (City of San Clemente, 2014). As stated in the City Council's 2004 approval of the hotel (City Council Resolution No. 04-61), the hotel and surrounding commercial development was designed to match the City's Spanish Colonial Revival architecture, which would ensure consistency with the General Plan's Land Use Policy LU-2.01 that requires new commercial development to demonstrate compatibility with community character (City of San Clemente, 2014).

### 3.1.4. Summary of Findings

Modification of MCSP Section 502 (V)(D) to allow the hotel (Approved Site Plan Building 15) to be permitted with an exception to the maximum building height, similar to the theater, would not result in any new or more severe significant Land Use impacts not previously addressed in the Final EIR. The proposed modification would stay consistent with the purpose and intended use of the RC designation. The modification would not conflict with any of the goals and objectives of the MCSP. The additional proposed height for the hotel would be the same as the current allowable exception for a theater and clocktower. This additional exception would support the City's intent of having a theater and hotel as the landmark features of the MCSP's regional commercial center.

Overall, while the amended maximum height for the hotel is a minor modification to the RC development standard, there would be no change to the purpose and applicability of the MCSP's development standards. The height exception would only apply to a specific property (Building 15) that is intended to serve as an architectural landmark together with the approved theater, and would not apply to any other use in the RC zone. Furthermore, confirming the hotel as an eligible landmark structure with a height exception supports the City's adopted economic development and visitor-serving objectives while maintaining consistency with community character policies.

The maximum height exception for the approved hotel would not adversely affect land use compatibility or policy consistency. All potential land use compatibility impacts associated with development of the regional commercial portion of the MCSP were adequately evaluated in the Final EIR. No new or more severe significant impacts to land use or relevant planning policies and programs would occur from the proposed modification of MCSP Section 502 (V)(D).

## 3.2. Noise

### 3.2.1. Baseline Conditions

The Final EIR documented a transportation-dominated noise environment, with I-5 as the primary source and arterial traffic as a secondary source. Ambient conditions were characterized using Community Noise Equivalent Level (CNEL) at existing off-site neighborhoods, schools, parks, and at planned receptors within the MCSP (City of San Clemente, 1998b).

Residential and commercial development implemented under the MCSP has established ongoing operational noise sources along arterials within the planning area, and specifically within the RC zone. These sources include vehicle pass-bys, parking lot activity, loading, HVAC equipment, and landscape maintenance associated with built uses. The overall ambient environment adjacent to the project site remains transportation dominated with I-5 as the primary contributor, and arterial traffic and localized on-site activity providing secondary contributions, consistent with the conditions described in the Final EIR (City of San Clemente, 1998b).

### 3.2.2. Summary of Final EIR Impact Conclusions

The Final EIR applied the City's community noise exposure criteria using CNEL and the State interior noise standard of 45 dB CNEL for habitable rooms. For residential outdoor use areas, the Final EIR used 65 dB CNEL as the maximum acceptable exterior level. These thresholds governed significance determinations and the design of required noise attenuation for new residential development within the MCSP (City of San Clemente, 1998b).

#### *Construction Noise*

Final EIR Section 4.3.4.1 identified short-term construction noise as a potentially significant impact where heavy equipment would operate near existing sensitive receptors. Required measures included restricting construction to City-allowed hours, maintaining effective equipment mufflers, and locating stationary equipment and staging areas away from occupied dwellings. Construction noise impacts were determined to be less than significant following implementation of Mitigation Measure (MM) 4.3-1a and MM 4.3-1b.

**MM 4.3-1a** All construction equipment shall use properly operating mufflers, and no combustion equipment such as pumps or generators shall be allowed to operate within 500 feet of any occupied residence from 7:30 a.m. to 5:30 p.m. unless the equipment is surrounded by a noise protection barrier acceptable to the City Engineer or designee.

**MM 4.3-1b** Prior to the issuance of grading permits, the grading and construction contractor(s) shall demonstrate via an access/staging plan that all construction equipment staging will be performed as far as possible from occupied dwellings.

The Final EIR also identified heavy construction equipment and overlapping grading and building activities as temporary noise sources with the potential to elevate daytime ambient levels at nearby receptors. The Final EIR determined that these effects would be addressed by Standard Condition (SC) 4.3-1.

**SC 4.3-1** As a condition imposed on grading permits, the City of San Clemente will limit the hours of construction and excavation work to 7:00 a.m. to 7:00 p.m. on weekdays and Saturdays, and prohibit such activity on Sundays and holidays. The City will ensure that construction time limits are enforced for the duration of construction activity on the project site. Additionally, the City shall enforce Municipal Code Section 27A-18 for grading and equipment operations, which states that equipment start-up cannot be conducted between 5:30 p.m. and 7:30 a.m., nor on Saturdays, Sundays, and City holidays, unless otherwise determined by the City Engineer. The hours can be longer or shorter, based upon the City Engineer's findings of health, safety, or welfare of the surrounding community.

### *Operational Noise*

The Final EIR modeled roadway noise from I-5 and adjacent arterials for existing and future with − and without − project conditions and reported CNEL at reference distances along key links serving the site. Final EIR Section 4.3.4.1 concluded that non-project-related traffic on I-5 was expected to mask project-related noise at receptors outside the Marblehead Coastal project area (City of San Clemente, 1998b). The Final EIR found that first-row residential lots along perimeter roadways would experience exterior CNEL above 65 dB without attenuation. To ensure compliance, the Final EIR required a project-level sound attenuation program specifying perimeter barriers, setbacks, and other site design features to achieve 65 dB CNEL or less at private outdoor use areas, and 45 dB CNEL or less inside habitable rooms. The Final EIR also required tract-level acoustic analyses at the time of precise grading and building permits and, where needed, enhanced building components for facades facing perimeter roadways to meet the interior standard. Operational noise impacts were determined to be less than significant following implementation of MM 4.3-1c and MM 4.3-1d.

**MM 4.3-1c** Prior to the issuance of residential precise grading permits and building permits, the owner or designee shall submit for review, and obtain the approval of the City Building Official or designee for, a final sound attenuation plan. All residential lots and dwellings shall be sound attenuated against present and projected noise, which shall be the sum of all noise impacting the project, so as not to exceed an exterior standard of 65 dB CNEL (Community Noise Equivalent Level) in outdoor living areas and an indoor standard of 45 dB CNEL in all habitable rooms. Evidence prepared by a County-approved acoustical consultant shall indicate that standard six-foot perimeter walls will be adequate to -satisfy these standards in a manner consistent with applicable City Ordinances or shall indicate other appropriate mitigation measures.

**MM 4.3-1d** Prior to the issuance of building permits, any two-story developments within 145 feet of Vista Hermosa or El Camino Real, or within 175 feet of Avd. Pico should have a structural noise attenuation analysis performed to verify that structural components are adequate to meet the interior noise standard of 45 dB CNEL.

Based on the thresholds and measures summarized above, Final EIR Section 4.3.4.2 concluded that construction and operational noise would be less than significant with mitigation and with

implementation of the required sound attenuation program and building design measures (City of San Clemente, 1998b).

### 3.2.3. Consideration of Changes to Impact Conclusions

The following section explains how the effects of the project would be consistent with the noise analysis and conclusions presented in the MCSP Final EIR.

***Construction Noise***

The height exception would not change the noise-related construction requirements for the hotel structure. Any construction within the MCSP will remain subject to the Final EIR construction noise measures and conditions (i.e., MM 4.3-1a, MM 4.3-1b, and SC 4.3-1) regulating City construction hours and practices (Final EIR pages 4.3-9 to 4.3-12). The proposed modification would not change the location of construction relative to sensitive receptors, nor would the modification alter any applicable mitigation measures. As a result, no new significant construction noise impacts would occur and there would be no change in the severity of impacts from what was presented in the Final EIR.

***Operational Noise***

The height exception may shift some of the hotel's mechanical equipment, rooftop appurtenances, or guest amenities to a higher elevation than what was described in the 2004 Approved Site Plan (City of San Clemente, 2004). However, the Final EIR requires development within the MCSP to incorporate stationary-source noise controls that achieve applicable City noise limits at the nearest off-site receptors, including shielding, parapets or screens, equipment selection, and siting (Final EIR pages 4.3-10 to 4.3-12). These noise-reduction measures are independent of building height and will remain binding on any future hotel development within the RC designation. To further ensure consistency with current City policy frameworks, development of the approved hotel utilizing the height exception would remain subject to the City's standard noise control ordinances (i.e., San Clemente Municipal Code Chapter 8.48), as well as General Plan Safety Element policies to control ambient and stationary noise conditions, including entertainment-related noise on residential and other sensitive uses (i.e., Policy S-4.01 and Policy S-4.08) (City of San Clemente, 2014).

As discussed in Addendum Sections 3.2.1 and 3.2.2, the RC zone is characterized by commercial activity and major transportation corridors, and the Final EIR concluded that stationary-source noise would be less than significant with implementation of MM 4.3-1 and SC 4.3-1 (Final EIR page 4.3-12). Allowing the hotel structure to be eligible for the RC zone's existing height exception would not introduce new noise sources beyond those evaluated for the RC zone, nor would it change the proximity of noise sources to sensitive receptors. Therefore, the proposed modification would not create a new significant operational noise impact or make a previously identified impact more severe.

### 3.2.4. Summary of Findings

The proposed modification to MCSP Section 502(V)(D) would allow the approved hotel use within the RC area to utilize the same maximum height exception already afforded to the theater and parking structure. This modification would not introduce a new land use type, alter the location of development relative to sensitive receptors, or change the City's applicable noise standards or adopted mitigation measures. Construction of the approved hotel under the proposed modification would continue to be subject to the City's updated policies intended to minimize noise exposure. The project would not create any new significant noise impacts and would not increase the severity of previously identified impacts presented in the Final EIR. No new mitigation measures are required to avoid or minimize potential impacts from this proposed modification.

# 3.3. Aesthetics

## 3.3.1. Baseline Conditions

At the time that the MCSP Final EIR was certified in June 1998, the 248-acre MCSP planning area was undeveloped (i.e., contained no permanent structures), although previous disturbance from former agricultural production, access roads, and bluff stabilization activities were evident in the viewshed (City of San Clemente, 1998b). Public views of the MCSP planning areas consisted of rows of eucalyptus and other mature trees along the I-5 corridor, with partially visible expanses of the Pacific Ocean (City of San Clement, 1998b).

Over the last 27 years, the planning area has been developed consistent with the MCSP, which includes commercial development within the MCSP's RC zone and residential development within the MCSP's Residential Low (RL) zone. The project would be located on a 1.7-acre parcel that was previously approved for a hotel development. A building permit was issued for the hotel in 2019 (B19-099); however, the project was tabled due to the Covid-19 pandemic, and the permit expired in 2022. The project site is surrounded by commercial development (i.e., Marblehead Coastal Promenade) as described in Addendum Section 3.1.1. The Marblehead Coastal Promenade is bound by major transportation corridors that include I-5, West Avenida Vista Hermosa, and East Avenida Pico. The MCSP Final EIR Section 4.11.1 describes the I-5 corridor as an Orange County-designated viewscape corridor, while the interchanges at West Avenida Vista Hermosa and at Avenida Pico are described as primary City entrances (City of San Clemente, 1998b). The transportation corridors are further surrounded by residential development and public facilities (e.g., schools, churches) that extend northeast and southwest of the I-5 corridor.

### *Description of Key Observation Points*

To provide context for the existing conditions surrounding the project site, this addendum includes baseline photos for eight Key Observation Points (KOPs) that are relevant to the project site. The purpose of selecting a KOP is to consider the degree of change from the most prominent and sensitive existing views of the site. KOP locations were based on an initial assessment of areas from which the hotel's proposed height may be visible within one mile of the site. Areas in which the project could be visible are characterized as the "seen area," which is depicted in Figure 3-1 as the area shaded in green. A seen area map integrates multiple lines-of-sight around a fixed reference point (i.e., the hotel with the modified height) while accounting for the local topography to identify the areas from which the site might be visible. It should be noted that a location may be within the seen area, but intervening vegetation may screen views of the site from that location.

All KOP figures are included at the end of Addendum Section 3.3. Figure 3-1 illustrates the location of each KOP relative to the project site. Figures 3-2a through 3-9a provide a baseline photo for each KOP.

Below is a brief discussion of the KOP viewsheds.

- **KOP-1: Avenida Vista Hermosa.** KOP-1 (Figure 3-2a) is located northeast of the MCSP planning area on Avenida Vista Hermosa, approximately 0.3 mile northeast of I-5, and is oriented southwest towards the project site. Avenida Vista Hermosa is a public roadway with ocean views that are partially obstructed by residential units and mature trees in the viewshed. The location of KOP-1 is within the southernmost segment of Avenida Vista Hermosa from which the hotel would be visible.[1]

[1] The southernmost segment of Avenida Vista Hermosa that falls within the project's seen area was selected as the site for KOP-1 to allow for a more conservative evaluation of the degree of visual change along this roadway. As KOP-1 is closer to the project site than points further north of KOP-1, the hotel simulation as seen from KOP-1 would show a more prominent degree of change.

- **KOP-2: Jim Johnson Memorial Park.** KOP-2 (Figure 3-3a) is located within the northwest corner of the MCSP planning area, at the eastern perimeter of the Jim Johnson Memorial Park that is adjacent to the I-5 offramp to West Avenida Vista Hermosa. KOP-2 is oriented southeast towards the project site and is representative of views from both the public park and from the West Avenida Vista Hermosa/I-5 interchange. As discussed in Addendum Section 3.3.1, the I-5 interchange at West Avenida Vista Hermosa is characterized as a primary entrance to the City. Mature trees and park facilities are dominant features in the viewshed and partially screen views of the MCSP's commercial development.
- **KOP-3: Sea Summit Pedestrian Trail.** KOP-3 (Figure 3-4a) is located within the MCSP planning area, at the Sea Summit trailhead that is at the junction of West Avenida Vista Hermosa and Avenida Costa Azul. KOP-3 is oriented northeast towards the project site and represents the views of recreationists who access the trail. Dominant features in the viewshed include West Avenida Vista Hermosa's four traffic lanes and landscaped median, as well as the southern perimeter of the recently constructed urgent care facility that is located within the MCSP's commercial development.
- **KOP-4: Pacific Coast Church (Private View).** KOP-4 (Figure 3-5a) is located northeast of the MCSP planning area in the Pacific Coast Church parking lot, approximately 200 feet north of I-5, and is oriented southwest towards the project site. Although KOP-4 is located on private property, it was selected due to its proximity to the project. The urgent care facility is a dominant feature in the viewshed from KOP-4, with background views of the ocean partially obstructed by residential units.
- **KOP-5: Highland Light-Residential (Private View).** KOP-5 (Figure 3-6a) is located east-northeast of the MCSP planning area on the southern slope of the Highland Light residential community approximately 70 feet north of Calle Frontera, which is a public roadway. KOP-5 is oriented west towards the project and has a higher vantage than Calle Frontera to approximate views from the residential properties nearest to the project site (within the Highland Light community). The undeveloped property southwest of KOP-5 is the dominant feature in the viewshed, while the urgent care facility is notably visible in the viewshed's middleground. Background views of the ocean are mostly obstructed by the existing commercial development, residential units, and mature trees.
- **KOP-6: Highland Light-Residential (Private View).** KOP-6 (Figure 3-7a) is located east-northeast of the MCSP planning area on Avenida Faceta, approximately 0.3 mile northeast of I-5, and is oriented west towards the project site. Avenida Faceta is a private roadway and is only accessible to residents of the Highland Light community. KOP-6 would not be a public view but is included to provide context to the anticipated degree of visual change for established residences within the Marblehead Inland planning area. The viewshed from KOP-6 provides unobstructed ocean views, with residential units and vegetation as prominent features in the landscape.
- **KOP-7: Highland Light-Residential (Private View).** KOP-7 (Figure 3-8a) is located east-northeast of the MCSP planning area at the entrance to the Highland Light community, west of the gatehouse and approximately 100 feet north of Calle Frontera. KOP-7 is oriented west towards the project site. Views from KOP-7 would typically be seen only by residents within the Highland Light community as they exit the community. KOP-7 was selected to provide additional context to the anticipated degree of visual change from established residences closer in proximity to the project site than KOP-6 within the Marblehead Inland planning area. The viewshed from KOP-7 provides a mostly unobstructed view of the ocean and distant coastline, with residential units and vegetation as prominent features in the landscape.
- **KOP-8: St. Andrew's By the Sea UMC (Private View).** KOP-8 (Figure 3-9a) is located east-northeast of the MCSP planning area in the parking lot for St. Andrew's By the Sea United Methodist Church (UMC), approximately 680 feet northwest of the Avenida Pico/I-5 interchange, and is oriented west towards the project site. Although KOP-8 is located on private property, it was selected as a representative view

from the adjacent residential and public serving facilities (school, day care, military family outreach) located along the eastern boundary of the Marblehead Inland planning area. The viewshed from KOP-8 provides a mostly unobstructed view of the ocean and distant coastline, with residential units and commercial development (i.e., outlets) as prominent features in the landscape.

## 3.3.2. Summary of Final EIR Impact Conclusions

The Final EIR evaluated the effects of the MCSP on the existing landscape and visual quality of the planning area. The EIR's aesthetics analysis focused on impacts to viewsheds and conflicts with the City's scenic and visual quality objectives for development.

***Impacts to Viewsheds***

The Final EIR analyzed changes in the public viewsheds from the West Avenida Vista Hermosa/I-5 interchange and the Avenida Pico/I-5 interchange. The Final EIR concluded that views would be altered by the proposed regional commercial development southwest of I-5. These impacts include the following:

- Views from the West Avenida Vista Hermosa/I-5 interchange would be significantly altered by proposed interchange construction and site development. Commercial development would dominate the foreground viewshed, with residential units comprising the middleground elements.
- Views from Avenida Pico/I-5 interchange would encompass commercial structures in near middleground views (at Avenida Pico and I-5), as well as distant middleground and background commercial elements extending northward along the I-5 corridor. A portion of the viewshed would be obstructed by the nearest commercial structures and some already partially interrupted westward ocean views would be cut off completely.
- Primary ocean views to the southwest would be unaffected within the MCSP planning areas along West Avenida Vista Hermosa, Avenida Pico, El Camino Real, and Camino Capistrano.

Given the size and undeveloped character of the MCSP planning area, Section 4.11.4.1 of the Final EIR determined that views of the planning area from key public viewsheds would be significantly altered from implementation of the MCSP (City of San Clemente, 1998b). However, the MCSP established seven vista points within the planning area to enhance visual access to the coastline. Five vista points are located in the southern portion of the planning area (El Camino Real Bluff trail and Marblehead Coastal Park) and two vista points are located in the proposed commercial development along West Avenida Vista Hermosa and serve as plaza/view overlooks. The Final EIR Section 4.11.4.1 concluded that since the project would retain and enhance the most visible portions of the site through these vista points, the visual uniqueness and vividness inherent in those scenic elements would not be diluted by site development (City of San Clemente, 1998b).

The Final EIR also discussed changes in the views of the MCSP planning area from residential communities such as Marblehead Inland and Colony Cove and determined that residential views would be adversely affected by the MCSP. The Final EIR concluded that while existing residents' concerns related to view preservation, property values, and quality of life are valid and important matters, the evaluation of significant effects is focused on impacts to views from public areas and view easements. The EIR's aesthetics impact analysis did not focus on impacts to views from an individual private lot. Final EIR Section 4.11.2 states the following:

> Although some residents directly adjacent to and inland from the Marblehead Coastal area will object to having their views altered, there are nonetheless various public policies that support public gain to the unavoidable detriment of private preference. For instance, Section 30251 of the Coastal Act states in part that "the scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance."

> Therefore, while private views of open space and coastal resources are not overlooked in the analysis, public viewsheds that have the potential to serve as recreational aesthetic resources for the greatest number of people bear more influence on the determination of impact significance. (City of San Clemente, 1998b, 4.11-8)

***Conflicts with scenic and visual quality objectives***

The Final EIR analyzed the MCSP's compatibility with the City's scenic and visual quality objectives for development as articulated in the General Plan goals, objectives, and policies. As described in Final EIR Section 4.11.3, the General Plan promotes good quality urban design and aesthetic resource preservation as important components of a project's design process prior to City approval. The Final EIR explains that this design review process would ensure that development under the MCSP is consistent with the MCSP's Design Guidelines that address scenic view and resource protection. For example, per Final EIR Section 4.11.4.1, the MCSP was found to be consistent with Orange County's viewscape corridor designation (for I-5) due to the MCSP's required development setbacks and landscape buffers along the freeway corridor (City of San Clemente, 1998b). Final EIR Section 4.11.3 also explains that the General Plan does not contain specific conditions relating to the preservation of scenic quality that are applicable to the MCSP. Final EIR Section 4.11.6 concluded that with implementation of the standard conditions and design review procedures imposed by the City of San Clemente, visual impacts associated with development under the MCSP would remain at a less-than-significant level (City of San Clemente, 1998b).

## 3.3.3. Consideration of Changes to Impact Conclusions

The height exception for the hotel structure would result in the same types and severity of aesthetic resource impacts as described in the MCSP Final EIR. The following section describes the effects of the modified height exception on viewsheds and its consistency with the City's scenic and visual quality objectives for development.

***View Simulations: Impacts to Viewsheds***

Visual simulations have been prepared for each of the eight KOPs to illustrate the degree of change that would occur from modification of the hotel's allowable height. These simulations are included at the end of Addendum Section 3.3 (Figures 3-2b through 3-9b). Below is a discussion of anticipated viewshed changes from each KOP.

- **KOP-1: Avenida Vista Hermosa.** Figure 3-2b includes a simulation of the hotel with the modified height as seen from KOP-1. The majority of the hotel would be screened by the mature trees along Avenida Vista Hermosa. Even with the modified height, the hotel structure blends into the background of existing commercial and residential development. There would be no notable change in the current viewshed from KOP-1.
- **KOP-2: Jim Johnson Memorial Park.** Figure 3-3b includes a simulation of the hotel with the modified height as seen from KOP-2, which is representative of views from the public park and West Avenida Vista Hermosa/I-5 interchange. The hotel structure is partially screened by the mature trees along West Avenida Vista Hermosa, although the structure would be prominent in the viewshed given this KOP's close proximity to the project site. As discussed in Addendum Section 3.3.2, the Final EIR determined that views from the West Avenida Vista Hermosa/I-5 interchange would be significantly altered by site development under the MCSP and further stated that commercial development would dominate the foreground viewshed (Final EIR pages 4.11-9 to 4.11-10). Therefore, changes in the viewshed as shown in KOP-2 would be consistent with the Final EIR's conclusions of significant alterations to views from the West Avenida Vista Hermosa interchange resulting from the MCSP's proposed commercial development.

- **KOP-3: Sea Summit Pedestrian Trail.** Figure 3-4b includes a simulation of the hotel with the modified height as seen from the Sea Summit trailhead at KOP-3. This KOP is oriented towards the MCSP's regional commercial center, where the hotel structure would be a dominant feature in the viewshed. While the trailhead is located at KOP-3, the trail network extends southwest through the MCSP planning area towards the coastline. The trail provides recreationists with ocean views, and the location of the hotel northeast of the trailhead would not interfere with the coastal viewshed along the trail network. As discussed in Addendum Section 3.3.2, the Final EIR explained that development under the MCSP would preserve ocean views from plaza/view overlooks along West Avenida Vista Hermosa. Per the MCSP's Approved Site Plan, the hotel structure (Building 15) would be located northeast of West Avenida Vista Hermosa and would not disrupt ocean views from established vista points. Consequently, the proposed modification to the hotel's height would be consistent with the Final EIR's conclusions that the MCSP is designed to retain and enhance the most visible portions of the planning area (i.e., coastal views) through vista points (West Avenida Vista Hermosa, Avenida Pico, El Camino Real, and Camino Capistrano) that would not be diluted by site development (Final EIR pages 4.11-12 and 4.11-14).
- **KOP-4: Pacific Coast Church (Private View).** Figure 3-5b includes a simulation of the hotel with the modified height as seen from the Pacific Coast Church parking lot. The hotel structure would be a dominant feature in the viewshed given this KOP's close proximity to the project site, and the hotel would obstruct ocean views. This obstruction would be an adverse change to the viewshed from KOP-4. As described in Addendum Section 3.3.2, the Final EIR discussed the effects of the MCSP on the views from the Marblehead Inland community northeast of I-5. The Final EIR concluded that the open space and coastal components of viewsheds from individual lots within the Marblehead Inland community would be adversely affected by development under the MCSP (Final EIR page 4.11-10). Therefore, changes in the viewshed as shown in KOP-4 would be consistent with the Final EIR's conclusions of significant alterations to private viewsheds resulting from the MCSP's proposed commercial development.
- **KOP-5: Highland Light-Residential (Private View).** Figure 3-6b includes a simulation of the hotel with the modified height as seen from the residential properties adjacent to Calle Frontera within the Highland Light community. The hotel structure would alter the viewshed by becoming the dominant feature due to its size and massing. The hotel would also create an additional obstruction to ocean views from KOP-5, which would be an adverse change to this viewshed. The Final EIR discussed the effects of the MCSP on the views from the Marblehead Inland community and concluded that the open space and coastal components of viewsheds from individual lots would be adversely affected by development under the MCSP (Final EIR page 4.11-10). Therefore, changes in the viewshed as shown in KOP-5 would be consistent with the Final EIR's conclusions of significant alterations to private viewsheds resulting from the MCSP's proposed commercial development.
- **KOP-6: Highland Light-Residential (Private View).** Figure 3-7b includes a simulation of the hotel with the modified height as seen from Avenida Faceta within the Highland Light community. Due to the distance of KOP-6 from the project site, and the design of the hotel to match the surrounding Spanish Colonial Revival architecture, the hotel structure would blend into the existing development within MCSP's regional commercial center. The hotel would not obstruct ocean views from KOP-6 and there would be no notable change in the current viewshed.
- **KOP-7: Highland Light-Residential (Private View).** Figure 3-8b includes a simulation of the hotel with the modified height at the entrance to the Highland Light community. Due to the distance of KOP-7 from the project site, and the design of the hotel to match the surrounding Spanish Colonial Revival architecture, the hotel structure would blend into the existing development within MCSP's regional commercial center. While the hotel would slightly obstruct coastal views, the ocean would remain

visible along the entire viewshed from KOP-7. Overall changes to the current viewshed would be minimal.

- **KOP-8: St. Andrew's By the Sea UMC (Private View).** Figure 3-9b includes a simulation of the hotel with the modified height as seen from the residences located along the eastern boundary of the Marblehead Inland planning area, and the adjacent public serving facilities (church, school, day care, military family outreach). Due to the distance of KOP-8 from the project site, and the design of the hotel to match the surrounding Spanish Colonial Revival architecture, the hotel structure would blend into the existing development within MCSP's regional commercial center. The hotel would not obstruct ocean views from KOP-8 and there would be no notable change in the current viewshed.

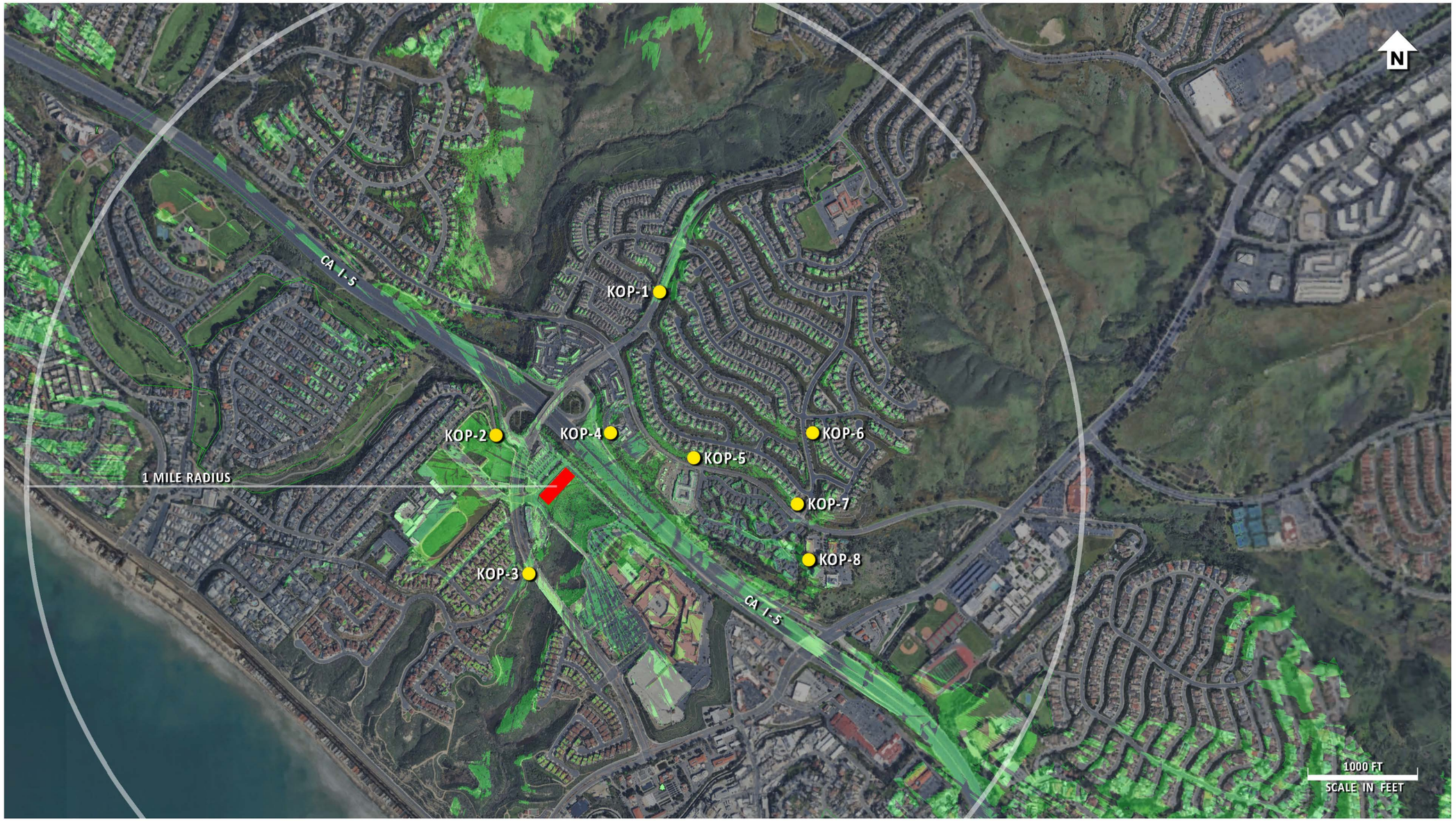
***Conflicts with scenic and visual quality objectives***

As described in Addendum Section 3.3.2, the Final EIR concluded that the MCSP's Design Guidelines would ensure future development under the MCSP is consistent with the City's scenic and visual quality objectives for good quality urban design and aesthetic resource preservation. The General Plan's Land Use Element and Urban Design Element identify public views as resources of community importance, and Policy UD-2.05 and Policy UD-5.14 require new construction and building design to preserve designated public view corridors (City of San Clemente, 2014). The proposed hotel modification does not alter public view corridors from West Avenida Vista Hermosa, Avenida Pico, Camino Capistrano, or the El Camino Real Bluff trail, which remain the focus of the MCSP's designated vista points. While some private views from inland neighborhoods may experience obstruction, the Final EIR's aesthetics analysis prioritized public views, which remains consistent with City policies to preserve public view corridors.

The height exception for the hotel structure (Approved Site Plan Building 15) would match the height of the regional commercial center's theater (Approved Site Plan Building 22), which would be consistent with the City's intent that the hotel and theater function as architectural landmarks for the MCSP's RC zone (City of San Clemente, 2004). The City further stated its intent that this architectural landmark designation would apply to two developments within the RC zone, and that if either the hotel or theater was not constructed, an alternative landmark structure would be required (City of San Clemente, 2004). Therefore, the height exception for the hotel structure would remain consistent with the City's scenic and visual quality objectives. Furthermore, the proposed modification would have no other change to the RC development standards (i.e., minimum lot area, setbacks, landscaping, signs, etc.), and the hotel (Building 15) would continue to adhere to these RC design guidelines and development standards.

## 3.3.4. Summary of Findings

The height exception for the hotel structure would not create any significant new aesthetic resource impacts or significant changes to the impact conclusions presented in the Final EIR. Impacts to viewsheds from the height exception would be of equivalent magnitude to those identified in the Final EIR. The proposed height exception would remain consistent with the City's scenic and visual quality objectives for good quality urban design and aesthetic resource preservation, as described in the General Plan's Land Use Element and Urban Design Element, and the modification would not alter a public view corridor. No new mitigation measures are required to avoid or minimize potential impacts from this proposed modification.




**VIEW-SHED METHODOLOGY:**

The basis for the view-shed study was calculated from a 360-degree view, emanating from a specific geographic location in order to predict which surrounding features might be visible from it; similar to rotating the light source of a lighthouse. The initial study area for this view-shed analysis in San Clemente, CA utilized a 1 mile radius, integrating multiple lines-of-sight around a fixed reference location in order to predict and map its overall view-shed. The converse of this methodology is also true: the resulting study also reveals which surrounding areas might see the fixed reference point, in this instance the roof lodge atop the hotel. For this analysis, the view-shed reference point was fixed atop a specific geographic point, centered at the peak of the rooftop lodge (altitude set at 62 FT above ground elevation and continuous). The resulting seen area map above shows the areas coded in green, both near & distant, from which the new hotel *might* be visible from. **Note**: Areas coded in green as "*might be visible*" may still be screened from view by intervening landscape, which is not a view-shed processing parameter. The source data provided for this view-shed study was in the form of AutoCAD.dwg and .PDF files. The position and height of the new hotel was modeled from site plans and elevations provided by the applicant.

## VIEW-SHED

SEEN-UNSEEN AREA MAP
DATE: 07/23/2025

### LEGEND:

- PROJECT LOCATION
- AREAS WHERE PROJECT MIGHT BE VISIBLE
- KEY OBSERVATION POINTS (KOPs)

### KOP LOCATIONS:

**KOP-1:** AVENIDA VISTA HERMOSA

**KOP-2:** JIM JOHNSON MEMORIAL PARK AT I-5 SOUTH OFF-RAMP

**KOP-3:** SEA SUMMIT BICYCLE TRAIL HEAD

**KOP-4:** PACIFIC COAST CHURCH

**KOP-5:** HIGHLAND LIGHT RESIDENTIAL COMMUNITY

**KOP-6**: HIGHLAND LIGHT RESIDENTIAL COMMUNITY

**KOP-7:** HIGHLAND LIGHT RESIDENTIAL COMMUNITY

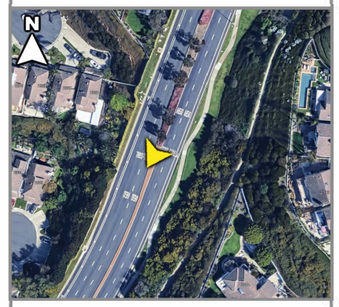
**KOP-8:** ST. ANDREW'S BY THE SEA UMC

**Figure 3-1: KOP Locations**

3DSCAPE
WWW.3DSCAPE.NET

**MARBLEHEAD: KOP-01**
AVENIDA VISTA HERMOSA

(EXISTING CONDITION)




KOP LOCATION

**KOP FIELD DATA**

**POSITION (GPS):**
33°26'53.79"N 117°37'39.14"W

**ELEVATION:**
276 FT

**DISTANCE:**
2,154 FT (.41 MILES)

**HEADING:**
208°

**CAMERA LENS:**
35 mm

**DATE:**
07/16/2025 @ 10:39 AM

WWW.3DSCAPE.NET

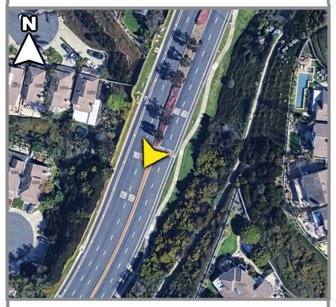
**Figure 3-2a: KOP-1 Existing Conditions**

3DSCAPE




**MARBLEHEAD: KOP-01**
AVENIDA VISTA HERMOSA

(VISUAL SIMULATION)
07/23/2025




KOP LOCATION

**KOP FIELD DATA**

**POSITION (GPS):**
33°26'53.79"N 117°37'39.14"W

**ELEVATION:**
276 FT

**DISTANCE:**
2,154 FT (.41 MILES)

**HEADING:**
208°

**CAMERA LENS:**
35 mm

**DATE:**
07/16/2025 @ 10:39 AM

WWW.3DSCAPE.NET

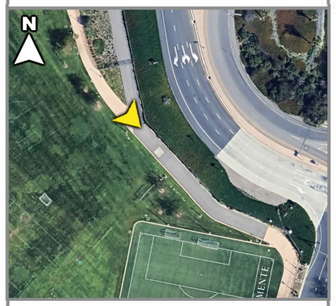
**Figure 3-2b: KOP-1 Visual Simulation**

3DSCAPE




**MARBLEHEAD: KOP-02**
JIM JOHNSON MEMORIAL PARK

(EXISTING CONDITION)




KOP LOCATION

**KOP FIELD DATA**

**POSITION (GPS):**
33°26'40.14"N 117°37'58.18"W

**ELEVATION:**
191 FT

**DISTANCE:**
782 FT (.15 MILES)

**HEADING:**
130°

**CAMERA LENS:**
35 mm

**DATE:**
07/16/2025 @ 12:06 PM

WWW.3DSCAPE.NET

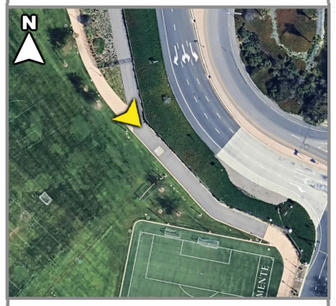
**Figure 3-3a: KOP-2 Existing Conditions**

3DSCAPE




**MARBLEHEAD: KOP-02**
JIM JOHNSON MEMORIAL PARK

(VISUAL SIMULATION)
07/23/2025




KOP LOCATION

**KOP FIELD DATA**

**POSITION (GPS):**
33°26'40.14"N 117°37'58.18"W

**ELEVATION:**
191 FT

**DISTANCE:**
782 FT (.15 MILES)

**HEADING:**
130°

**CAMERA LENS:**
35 mm

**DATE:**
07/16/2025 @ 12:06 PM

WWW.3DSCAPE.NET

**Figure 3-3b: KOP-2 Visual Simulation**

3DSCAPE




**MARBLEHEAD: KOP-03**
SEA SUMMIT BICYCLE TRAIL

(EXISTING CONDITION)




KOP LOCATION

**KOP FIELD DATA**

**POSITION (GPS):**
33°26'26.27"N 117°37'54.33"W

**ELEVATION:**
168 FT

**DISTANCE:**
933 FT (.18 MILES)

**HEADING:**
16°

**CAMERA LENS:**
35 mm

**DATE:**
07/16/2025 @ 12:21 PM

WWW.3DSCAPE.NET

**Figure 3-4a: KOP-3 Existing Conditions**

3DSCAPE




**MARBLEHEAD: KOP-03**
SEA SUMMIT BICYCLE TRAIL

(VISUAL SIMULATION)
07/23/2025




KOP LOCATION

**KOP FIELD DATA**

**POSITION (GPS):**
33°26'26.27"N 117°37'54.33"W

**ELEVATION:**
168 FT

**DISTANCE:**
933 FT (.18 MILES)

**HEADING:**
16°

**CAMERA LENS:**
35 mm

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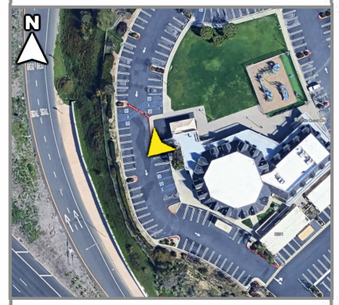
WWW.3DSCAPE.NET

**Figure 3-4b: KOP-3 Visual Simulation**

3DSCAPE

**MARBLEHEAD: KOP-04**
PACIFIC COAST CHURCH

(EXISTING CONDITION)




KOP LOCATION

**KOP FIELD DATA**

**POSITION (GPS):**
33°26'40.81"N 117°37'45.04"W

**ELEVATION:**
220 FT

**DISTANCE:**
779 FT (.15 MILES)

**HEADING:**
222°

**CAMERA LENS:**
35 mm

**DATE:**
07/16/2025 @ 11:06 AM

WWW.3DSCAPE.NET

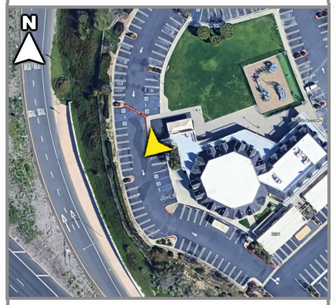
**Figure 3-5a: KOP-4 Existing Conditions**

3DSCAPE



**MARBLEHEAD: KOP-04**
PACIFIC COAST CHURCH

(VISUAL SIMULATION)
07/23/2025




KOP LOCATION

**KOP FIELD DATA**

**POSITION (GPS):**
33°26'40.81"N 117°37'45.04"W

**ELEVATION:**
220 FT

**DISTANCE:**
779 FT (.15 MILES)

**HEADING:**
222°

**CAMERA LENS:**
35 mm

**DATE:**
07/16/2025 @ 11:06 AM

WWW.3DSCAPE.NET

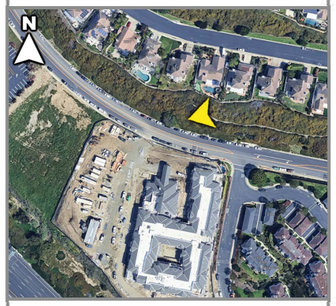
**Figure 3-5b: KOP-4 Visual Simulation**

3DSCAPE




**MARBLEHEAD: KOP-05**
HIGHLAND LIGHT - RESIDENTIAL

(EXISTING CONDITION)




KOP LOCATION

**KOP FIELD DATA**

**POSITION (GPS):**
33°26'37.84"N 117°37'35.05"W

**ELEVATION:**
224 FT

**DISTANCE:**
1,396 FT (.26 MILES)

**HEADING:**
79°

**CAMERA LENS:**
35 mm

**DATE:**
07/16/2025 @ 11:24 AM

WWW.3DSCAPE.NET

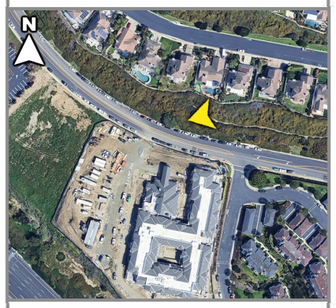
**Figure 3-6a: KOP-5 Existing Conditions**

3DSCAPE



**MARBLEHEAD: KOP-05**
HIGHLAND LIGHT - RESIDENTIAL

(VISUAL SIMULATION)
07/23/2025




KOP LOCATION

**KOP FIELD DATA**

**POSITION (GPS):**
33°26'37.84"N 117°37'35.05"W

**ELEVATION:**
224 FT

**DISTANCE:**
1,396 FT (.26 MILES)

**HEADING:**
79°

**CAMERA LENS:**
35 mm

**DATE:**
07/16/2025 @ 11:24 AM

WWW.3DSCAPE.NET

**Figure 3-6b: KOP-5 Visual Simulation**

3DSCAPE



**MARBLEHEAD: KOP-06**
HIGHLAND LIGHT - RESIDENTIAL

(EXISTING CONDITION)




KOP LOCATION

**KOP FIELD DATA**

**POSITION (GPS):**
33°26'40.37"N 117°37'21.29"W

**ELEVATION:**
331 FT

**DISTANCE:**
2,587 FT (.49 MILES)

**HEADING:**
82°

**CAMERA LENS:**
35 mm

**DATE:**
07/16/2025 @ 11:39 AM

WWW.3DSCAPE.NET

**Figure 3-7a: KOP-6 Existing Conditions**

3DSCAPE



**MARBLEHEAD: KOP-06**
HIGHLAND LIGHT - RESIDENTIAL

(VISUAL SIMULATION)
07/23/2025




KOP LOCATION

**KOP FIELD DATA**

**POSITION (GPS):**
33°26'40.37"N 117°37'21.29"W

**ELEVATION:**
331 FT

**DISTANCE:**
2,587 FT (.49 MILES)

**HEADING:**
82°

**CAMERA LENS:**
35 mm

**DATE:**
07/16/2025 @ 11:39 AM

WWW.3DSCAPE.NET

**Figure 3-7b: KOP-6 Visual Simulation**

3DSCAPE



**MARBLEHEAD: KOP-07**
HIGHLAND LIGHT - RESIDENTIAL

(EXISTING CONDITION)




KOP LOCATION

**KOP FIELD DATA**

**POSITION (GPS):**
33°26'33.39"N 117°37'23.18"W

**ELEVATION:**
268 FT

**DISTANCE:**
2,372 FT (.45 MILES)

**HEADING:**
94°

**CAMERA LENS:**
35 mm

**DATE:**
07/16/2025 @ 11:48 AM

WWW.3DSCAPE.NET

**Figure 3-8a: KOP-7 Existing Conditions**

3DSCAPE

**MARBLEHEAD: KOP-07**
HIGHLAND LIGHT - RESIDENTIAL

(VISUAL SIMULATION)
07/23/2025




KOP LOCATION

**KOP FIELD DATA**

**POSITION (GPS):**
33°26'33.39"N 117°37'23.18"W

**ELEVATION:**
268 FT

**DISTANCE:**
2,372 FT (.45 MILES)

**HEADING:**
94°

**CAMERA LENS:**
35 mm

**DATE:**
07/16/2025 @ 11:48 AM

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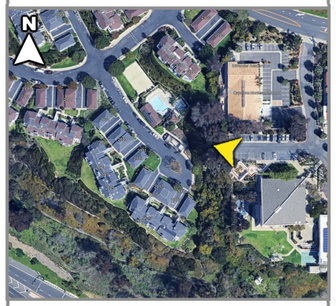
**Figure 3-8b: KOP-7 Visual Simulation**

3DSCAPE




**MARBLEHEAD: KOP-08**
ST ANDREW'S BY THE SEA UMC

(EXISTING CONDITION)




KOP LOCATION

**KOP FIELD DATA**

**POSITION (GPS):**
33°26'28.11"N 117°37'22.15"W

**ELEVATION:**
276 FT

**DISTANCE:**
2,554 FT (.48 MILES)

**HEADING:**
106°

**CAMERA LENS:**
35 mm

**DATE:**
07/16/2025 @ 11:53 AM

WWW.3DSCAPE.NET

**Figure 3-9a: KOP-8 Existing Conditions**

3DSCAPE




**MARBLEHEAD: KOP-08**
ST ANDREW'S BY THE SEA UMC

(VISUAL SIMULATION)
07/23/2025




KOP LOCATION

**KOP FIELD DATA**

**POSITION (GPS):**
33°26'28.11"N 117°37'22.15"W

**ELEVATION:**
276 FT

**DISTANCE:**
2,554 FT (.48 MILES)

**HEADING:**
106°

**CAMERA LENS:**
35 mm

**DATE:**
07/16/2025 @ 11:53 AM

WWW.3DSCAPE.NET

**Figure 3-9b: KOP-8 Visual Simulation**

3DSCAPE

# 4. OTHER RESOURCES ANALYZED IN THE FINAL EIR

The following section provides a brief summary of the resources that are fully discussed in the Final EIR, and whose analyses have been incorporated by reference in this EIR Addendum. References to the applicable Final EIR sections and the MMRP (Final EIR Exhibit EIR-4) are included throughout the following discussion.

## Transportation and Circulation

Section 4.2 of the Final EIR evaluated the effects of transportation and circulation under the MCSP, including trip generation for the RC component, intersection and freeway ramp operations, site access, internal circulation, and the timing of frontage and off-site improvements (City of San Clemente, 1998b). The Final EIR concluded that traffic impacts under the MCSP would be less than significant with implementation of standard conditions and uniform codes identified in Final EIR Section 4.2.3, and with implementation of adopted mitigation measures MM 4.2-1 and MM 4.2-2 (Final EIR Chapter 11 and Exhibit EIR-4).

The Final EIR utilized a level of service (LOS) analysis for evaluating traffic impacts. Since 1998, the approach to traffic analysis under CEQA has replaced LOS with a metric that utilizes vehicle miles traveled (VMT). A common approach to evaluating VMT is to conduct a trip-based assessment of a project's transportation impacts. The Final EIR's transportation analysis remains consistent with this revised approach as it evaluated trip generation effects under the MCSP, for which it calculated future projections of trips per day for each of the MCSP land use types. The potential trip generation effects associated with the MCSP's commercial center (including a future hotel development) were included in the vehicle trip calculations. Furthermore, the Final EIR evaluated the MCSP's proposed design features to reduce vehicle trips through improved access to public transit and multi-modal public trails (Final EIR Section 4.2.4.1).

The proposed modification to MCSP Section 502(V)(D) would not modify the approved circulation framework, anticipated vehicle trips, or the scope, timing, and applicability of transportation improvements identified in the Final EIR and MMRP (City of San Clemente, 1998b). Traffic associated with the MCSP's regional commercial center, in which a hotel is an allowable use, was fully analyzed in Final EIR Section 4.2.4.1. The proposed modification does not authorize an increase in development intensity or alter circulation patterns. Development would remain subject to the MCSP Circulation Plan and RC development standards for parking and access. The proposed modification would also remain consistent with the goals and policies of the General Plan's Mobility and Complete Streets Element requiring new development to maintain adequate circulation and multimodal access (e.g., Policy M-1.01, M-1.19, M-1.25). Accordingly, the proposed modification would have no new significant impact to transportation and circulation, and there would be no change in the severity of impacts from the discussion provided in Final EIR Section 4.2.

## Air Quality

Section 4.4 of the Final EIR evaluated construction and operational emissions for buildout of the MCSP, identified significance thresholds for criteria pollutants, and adopted mitigation to control fugitive dust and reduce exhaust emissions from construction equipment and project operations (City of San Clemente, 1998b). The Final EIR also addressed consistency with applicable regional air quality planning assumptions based on the land uses and intensities permitted by the MCSP (City of San Clemente, 1998a and 1998b). The Final EIR concluded that short- and long-term air quality emissions from development under the MCSP would remain significant and unavoidable, even after the implementation of adopted mitigation measures MM 4.4-1a, MM 4.4-1b, and MM 4.4-2a to MM 4.4-2h.

The proposed modification to MCSP Section 502(V)(D) would not change the approved land use types within an RC designation, nor would it change the construction measures applicable to development under the MCSP. Operational emissions associated with the MCSP's regional commercial center, in which a hotel is an allowable use, were fully analyzed in Final EIR Section 4.4.4.2. The Final EIR concluded that project-related emissions would exceed South Coast Air Quality Management District significance thresholds for primary exhaust pollutants (i.e., ROC, CO, NOx) (Final EIR pages 4.4-15 to 4.4-16). Accordingly, the proposed modification would have no new significant air quality impact, and there would be no change in the severity of impacts from the discussion provided in Final EIR Section 4.4.

### Soils and Geology

Section 4.5 of the Final EIR evaluated geologic, seismic, and soil conditions for buildout of the MCSP, including potential for strong seismic ground shaking, liquefaction and differential settlement, expansive soils, slope stability, erosion during grading, and long-term performance of engineered slopes and retaining systems. Final EIR Section 4.5.4 described the MCSP grading plans and requirements for a comprehensive geotechnical investigation, plan review, construction monitoring, erosion and sediment control, and conformance with applicable building and grading codes. The Final EIR concluded that implementation of SC 4.5-1 as well as the mitigation measures and standard engineering practices summarized in the Marblehead Coastal Geotechnical Report would ensure that geotechnical impacts would remain less than significant (City of San Clemente, 1998b).

The proposed modification to MCSP Section 502(V)(D) would not modify the approved land use types within an RC designation, nor would it change the mitigation measures, standard conditions, and engineering practices required for construction under the MCSP. The soil stability and suitability for development of the RC area, in which a hotel is an allowable use, were fully analyzed in Final EIR Section 4.5.4. The Final EIR concluded that all proposed commercial structures would be subject to the specific technical recommendations in the Marblehead Coastal Geotechnical Report, and construction would adhere to the seismic stability and reinforcement requirements of the Uniform Building Code (Final EIR pages 4.5-8 to 4.5-9). Accordingly, the proposed modification would have no new significant geotechnical impact, and there would be no change in the severity of impacts from the discussion provided in Final EIR Section 4.5.

### Population and Housing

Section 4.6 of the Final EIR evaluated the MCSP's potential to induce population growth, displace housing or people, and conflict with adopted regional growth forecasts. Final EIR Section 4.6.4 addressed the buildout of MCSP land uses, including the RC component, and concluded that development would occur consistent with the Specific Plan and applicable growth projections, with no displacement of existing housing (City of San Clemente, 1998b).

The proposed modification to MCSP Section 502(V)(D) would not change the approved land use types within an RC designation, nor would it remove or replace any existing housing. Employment generation associated with the MCSP's regional commercial center, in which a hotel is an allowable use, was fully analyzed in Final EIR Section 4.6.4. Development within the regional commercial center would remain subject to the Approved Site Plan. Accordingly, the proposed modification would have no new significant impact to population and housing, and there would be no change in the severity of impacts from the discussion provided in Final EIR Section 4.6.

### Cultural/Scientific Resources

Section 4.7 of the Final EIR evaluated archaeological, historical, and paleontological resources within the MCSP and identified sensitivity based on prior investigations and underlying geologic units (City of San

Clemente, 1998b). The Final EIR concluded that impacts to cultural resources under the MCSP would be less than significant with implementation of adopted mitigation measures MM 4.7-1a to MM 4.7-1g (Final EIR Chapter 11 and Exhibit EIR-4).

The proposed modification to MCSP Section 502(V)(D) would not authorize new ground disturbance within the MCSP beyond that evaluated in the Final EIR. Ground disturbance associated with the MCSP's regional commercial center, in which a hotel is an allowable use, was fully analyzed in Final EIR Section 4.7.4. The proposed modification does not authorize an increase in development intensity, and development would remain subject to the adopted mitigation measures that address grading and excavation of a project site. Accordingly, the proposed modification would have no new significant impact to cultural resources, and there would be no change in the severity of impacts from the discussion provided in Final EIR Section 4.7.

### San Onofre Emergency Evacuation Plan

Section 4.8 of the Final EIR evaluated emergency preparedness within the MCSP in coordination with the San Onofre Nuclear Generating Station emergency planning framework, including public alerting, designated evacuation routes, emergency vehicle access, and consistency with the City's standard conditions, uniform codes, and adopted procedures (City of San Clemente, 1998b). Final EIR Section 4.8.4 described the MCSP's circulation and access improvements and required compliance with the Nuclear Element of the City's General Plan.[2] The Final EIR concluded that the MCSP would have no significant impacts to public safety and would not affect the San Onofre Emergency Evacuation Plan.

Although the San Onofre Nuclear Generating Station is no longer in operation, spent nuclear fuel continues to be managed and stored at the facility. As such, the San Onofre Emergency Evacuation Plan remains a relevant planning document. The proposed modification to MCSP Section 502(V)(D) would not change evacuation plans nor create an impediment to emergency access routes. Accordingly, the proposed modification would have no new significant impact to public safety, established evacuation plans, and designated evacuation routes, and there would be no change in the severity of impacts from the discussion provided in Final EIR Section 4.8.

### Public Services and Facilities

Section 4.9 of the Final EIR evaluated demands on public services and facilities for MCSP buildout, including fire protection and emergency medical services, police protection, parks and recreation, libraries, and related public facilities (City of San Clemente, 1998b). The Final EIR concluded that impacts to public services would be less than significant with implementation of standard conditions and uniform codes identified in Final EIR Section 4.9.1.3, Section 4.9.2.3, Section 4.9.4.3, Section 4.9.5.3, and Section 4.9.6.3, and with implementation of adopted mitigation measure MM 4.9.4-1 (Final EIR Chapter 11 and Exhibit EIR-4).

The proposed modification to MCSP Section 502(V)(D) would not change the site's existing RC land use designation, nor would it change the mitigation measure and standard conditions specific to fire protection, police protection, school facilities, and utility facilities required for development under the MCSP. The hotel is an allowable use within the MCSP's regional commercial center and would be subject to the requirements of the Marblehead Coastal Fuel Modification plan that serves to reduce fire risk within the MCSP (see Final EIR pages 4.9-24 to 4.9-25). Accordingly, the proposed modification would have no

[2] Discussion of the since-decommissioned San Onofre Nuclear Generating Station (SONGS) is now contained within the Safety Element of the City's Centennial General Plan. In March 2025, the City adopted a Local Hazard Mitigation Plan that incorporates the latest policy guidance from the Federal Emergency Management Agency and the California Governor's Office of Emergency Services.

new significant impact to public services and facilities, and there would be no change in the severity of impacts from the discussion provided in Final EIR Section 4.9.

### Hydrology and Flood Control

Section 4.10 of the Final EIR evaluated drainage patterns, stormwater runoff and water quality, construction-period erosion and sedimentation, flood hazards, and the master drainage and flood control improvements for MCSP buildout (City of San Clemente, 1998b). Final EIR Section 4.10.4 described the MCSP's Storm Water Pollution and Prevention Plan and site-specific drainage plans that identify erosion and sediment control practices. The Final EIR concluded that hydrology and flood control impacts would be less than significant with implementation of standard conditions and uniform codes identified in Final EIR Section 4.10.3, and with implementation of adopted mitigation measures MM 4.10-1a, MM 4.10-1b, MM 4.10-2, and MM 4.10-3 (Final EIR Chapter 11 and Exhibit EIR-4).

The proposed modification to MCSP Section 502(V)(D) would not modify the approved land use types within an RC designation, nor would it change the mitigation measures and standard conditions required for construction under the MCSP. Issues related to flooding, erosion, and siltation associated with development of the regional commercial center, in which a hotel is an allowable use, were fully analyzed in Final EIR Section 4.10.4. The Final EIR concluded that construction under the MCSP would follow the recommendations of a Preliminary Stormwater Management Plan, and that all development would be subject to standard construction best management practices (Final EIR pages 4.10-16 to 4.10-17). Accordingly, the proposed modification would have no new impact to hydrology and flood control, and there would be no change in the severity of impacts from the discussion provided in Final EIR Section 4.10.

### Biological Resources

Section 4.12 of the Final EIR evaluated biological resources within the MCSP, including sensitive habitats, special-status species, jurisdictional waters and wetlands, wildlife movement, and edge effects from lighting, noise, and human activity (City of San Clemente, 1998b). Final EIR Section 4.12.5 identified avoidance, minimization, and mitigation requirements for construction and operations, including limits on grading within designated open space, preconstruction surveys, nesting bird protections, construction monitoring, landscape and lighting controls, and long-term open space management. The Final EIR concluded that impacts to biological resources would be less than significant with implementation of adopted mitigation measures MM 4.12-1a to MM 4.12-1c and MM 4.12-2a to 4.12-2c (Final EIR Chapter 11 and Exhibit EIR-4).

The proposed modification to MCSP Section 502(V)(D) would not authorize new disturbance within the MCSP beyond that evaluated in the Final EIR. Vegetation removal and habitat disturbance associated with development of the MCSP's regional commercial center, in which a hotel is an allowable use, were fully analyzed in Final EIR Section 4.12.4. The Final EIR concluded that construction under the MCSP would comply with the biological restoration and enhancement measures specified in the MCSP's Resource Management Plan (Final EIR pages 4.12-16 to 4.12-23). Accordingly, the proposed modification would have no new significant impact to biological resources, and there would be no change in the severity of impacts from the discussion provided in Final EIR Section 4.12.

### Recreation

Section 4.13 of the Final EIR evaluated parks, recreation, and open space under the MCSP, including provision of on-site open space, trail linkages, and access to nearby recreational amenities (City of San Clemente, 1998b). Final EIR Section 4.13.3 concluded that implementation of SC 4.13-1 would prevent the physical deterioration of existing recreational facilities as well as offset the need to construct or expand new recreational facilities beyond those planned as part of the MCSP (City of San Clemente, 1998b).

During the initial buildout of the MCSP, the applicant was subject to in-lieu park fees and dedication of parkland to meet the requirements of the City's Park Acquisition and Development Code (Final EIR page 4.13-6). The calculation of in-lieu fees and land dedication requirements under the MCSP already accounted for the MCSP's RC component in which a hotel is an allowable use. Accordingly, the proposed modification would have no new significant impact to recreation, and there would be no change in the severity of impacts from the discussion provided in Final EIR Section 4.13.

### Other CEQA Topics

Since the 1998 certification of the Final EIR, there have been updates to the CEQA Guidelines that address additional topics such as energy, greenhouse gas emissions, tribal cultural resources, and wildfire. The following is a summary of these topics and a discussion of how the proposed modification to MCSP Section 502(V)(D) would not trigger a new significant impact that was not addressed in the MCSP Final EIR.

- Energy. The requirement to evaluate a project's energy implications was added to CEQA Guidelines Appendix F (Energy Conservation) in 2009 and incorporated into CEQA Guidelines Appendix G (Environmental Checklist Form) in 2018. Prior to 2018, an EIR's discussion of energy resource impacts was typically included in an analysis of the project's irretrievable commitment of resources. MCSP Final EIR Chapter 9.0 describes the substantial commitment of energy resources (i.e., diesel fuel and electricity) that would be required to fully develop the MCSP. As the proposed modification to MCSP Section 502(V)(D) would not change the approved land use types or planned development under the MCSP, there would be no new impact or a change in the severity of energy resource impacts from the discussion provided in Final EIR Chapter 9.0.
- Greenhouse Gas Emissions. Although the evaluation of greenhouse gas emissions was not incorporated into the CEQA Guidelines until 2010, the MCSP Final EIR fully analyzed the emission impacts from both mobile source and stationary source pollution. For example, Final EIR Section 4.4.4.2 discussed emission impacts generated from energy consumption, which was characterized as on-site natural gas combustion for space and water heating, and off-site electrical generation from in-basin power resources (City of San Clemente, 1998b). These energy consumption emissions are typical examples of greenhouse gas emissions and were addressed in the Final EIR's analysis. The Final EIR concluded that future growth under the MCSP would contribute significantly to a sub-regional and regional air pollution burden. As the proposed modification to MCSP Section 502(V)(D) would not change the approved land use types or planned development under the MCSP, there would be no new impact or a change in the severity of impacts from the emissions discussion provided in Final EIR Section 4.4.
- Tribal Cultural Resources. A CEQA requirement to evaluate impacts to Tribal Cultural Resources was incorporated into the CEQA Guidelines in 2016. MCSP Final EIR Section 4.7 discussed tribal cultural resource sites that were recorded in the vicinity of the MCSP area and one resource site that was recorded within the MCSP area (City of San Clemente, 1998b). To mitigate potential impacts during development under the MCSP, the Final EIR included mitigation measure MM 4.7-1a (Final EIR Chapter 11 and Exhibit EIR-4) to address undiscovered resources. The proposed modification to MCSP Section 502(V)(D) would not authorize new ground disturbance within the MCSP beyond that evaluated in the Final EIR. Ground disturbance associated with the MCSP's regional commercial center, in which a hotel is an allowable use, was fully analyzed in Final EIR Section 4.7.4. The proposed modification does not authorize an increase in development intensity, and development would remain subject to the adopted mitigation measures that address grading and excavation of a project site. Accordingly, the proposed modification would have no new significant impact to tribal cultural resources, and there would be no change in the severity of impacts from the discussion provided in Final EIR Section 4.7.
- Wildfire. The evaluation of wildfire-specific risk was added to the CEQA Guidelines in 2018. The MCSP Final EIR addressed wildland fire risks (Final EIR Section 4.9.4.4) and discussed specific fuel modification

requirements to minimize risk within the MCSP (City of San Clemente, 1998b). On March 24, 2025, the California Department of Forestry and Fire Protection (CAL FIRE) issued updates to its recommended Fire Hazard Severity Zones within Local Responsibility Areas. The updated maps indicate that the project site would continue to be located outside of a Moderate, High, or Very High Fire Hazard Severity Zone (CAL FIRE, 2025). As such, the updated maps indicate that there would be no change in the fire hazards associated with the project site. Accordingly, the proposed modification to MCSP Section 502(V)(D) would have no new significant impact associated with wildfire, and there would be no change in the severity of impacts from the discussion provided in Final EIR Section 4.9.

# 5. SUMMARY AND CONCLUSION

The proposed modification to MCSP Section 502 (V)(D) to include the hotel as eligible for the same height exception granted to the theater has not altered the fundamental objectives of the MCSP as reflected in the certified EIR. Adding the hotel use as eligible for the maximum height exception aligns with the City's expectation that the theater and hotel would function equally as the anchoring architectural landmarks of the Marblehead Coastal Promenade. The proposed modification would only apply to the single hotel property that was previously identified in the Approved Site Plan as an architectural landmark, and would have no other change on the RC development standards under the MCSP.

Addendum Section 3.1 (Land Use and Related Planning) explained that the MCSP's RC designation already provides for this height exception to accommodate architectural features, and inclusion of the hotel in the maximum height exception would be a minor modification that would not alter the intent or application of the RC development standards. The proposed modification to MCSP Section 502 (V)(D) would not conflict with any existing or proposed land uses near the project site. No new significant impacts to land use or relevant planning policies and programs would occur from the proposed modification.

Addendum Section 3.2 (Noise) concluded that any construction within the MCSP would remain subject to the City's standard conditions and adopted mitigation measures. Such measures would include restrictions on the allowable hours of construction and ensuring that operational noise does not exceed exterior noise standards. Noise within the MCSP's RC zone continues to be characterized by commercial activity and major transportation corridors, and the proposed modification would not increase the proximity of commercial uses within the RC zone relative to sensitive receptors. The project would not create any new significant noise impacts and would not increase the severity of previously identified impacts presented in the Final EIR.

Addendum Section 3.3 (Aesthetics) described the purpose of the City's design review process to ensure that development under the MCSP is consistent with the MCSP's Design Guidelines that address scenic view and resource protection. Section 3.3 included photographs of existing conditions and visual simulations from 8 KOPs to evaluate baseline conditions against the proposed conditions, which demonstrated consistency with the aesthetics findings of the Final EIR. As part of the City's approval for the MCSP's regional commercial site plan, the City stated its intent that development of the hotel and theater should reflect the roles of these structures to serve as architectural landmarks for the Marblehead Coastal Promenade. Given this planning direction, the proposed height exception for the hotel to match the allowable height of the theater would remain consistent with the City's scenic and visual quality objectives for good quality urban design and aesthetic resource preservation. Furthermore, the proposed modification would not alter the viewshed from an established vista point. Impacts to viewsheds from the height exception would be of equivalent magnitude to those identified in the Final EIR, and no new mitigation measures are required to avoid or minimize potential impacts.

As described in Chapter 4, the proposed modification to MCSP Section 502 (V)(D) would not result in any new substantial environmental impacts nor increase the severity of previously identified environmental impacts. Therefore, the proposed height exception for the hotel structure would not introduce a new significant impact from what was presented in the certified EIR, nor require the development of new mitigation measures. Further, no new information, not known at the time of the Final EIR, has surfaced indicating the potential for new or more severe significant environmental impacts. The City has determined that an addendum to the certified Final EIR is the appropriate CEQA document for the technical adjustment to add the additional exception to the maximum height requirement within a regional commercial center.

In conclusion, the proposed modification is not only consistent with the certified MCSP Final EIR, but also advances the City's adopted long-term policy objectives under the Centennial General Plan. By supporting visitor-serving lodging in a regional commercial location, preserving designated public view corridors, maintaining compatibility with community character, and adhering to established design review standards, the proposed modification reflects and reinforces the City's vision of San Clemente as the "Spanish Village by the Sea."

# 6. REFERENCES

CAL FIRE (California Department of Forestry and Fire Protection). 2025. Fire Hazard Severity Zones. [online]: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones. Accessed August 27, 2025.

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_____. 1998a. Marblehead Coastal Specific Plan. Adopted August 5, 1998. Amended December 6, 2022.

_____. 1998b. Final Environmental Impact Report for the Marblehead Coastal General Plan Amendment 96-01, Specific Plan No. 95-02, Tentative Tract Map, Site Plans, Conditional Use Permit, and Sign Exception Permit. Certified June 23, 1998.

_____. 1998c. City Council Resolution No. 98-40. Adopted June 23, 1998