



Project No. G3422-52-01

March 13, 2026

Palacio Mission Bay, LLC
4545 Mission Bay Drive
San Diego, California 92109

Attention: Mr. Ketan Patel

Subject: RESPONSE TO CITY COMMENTS
PACIFIC BEACH HOTEL
4545 MISSION BAY DRIVE
SAN DIEGO, CALIFORNIA

- References:
1. *Preliminary Geotechnical Investigation, Pacific Beach Hotel, 4545 Mission Bay Drive, San Diego, California*, prepared by Geocon Incorporated, dated November 21, 2024 (Project No. G3422-52-01).
 2. *Design Submittal for a: Geopier Foundation System, Pacific Beach Hotel, 4545 Mission Bay Drive, San Diego, California*, prepared by Western Ground Improvements, Incorporated (Geopier), dated October 3, 2025 (Project No. GDC-904).
 3. *Project Issues Report (Discretionary Project), 4545 Mission Bay Drive*, prepared by City of San Diego, dated February 23, 2026 (Project No. PRJ-1129794).

Dear Mr. Patel:

In accordance with the request of the City of San Diego, we prepared this letter to address geotechnical review comments provided by the City of San Diego regarding the subject project. The review comments are included with our response immediately following.

Comment 00260: *Submit a geotechnical addendum or update letter that specifically addresses the proposed development for the purposes of CEQA review:*

Response: Acknowledged. This response letter represents our update for the subject project.

Comment 00261: *The project's geotechnical consultant has recommended possible options to attenuate potential seismic settlement and liquefaction impacts. Where the potential impacts may be attenuated in more than one specific way, the consultant should provide performance standards for these measures to mitigate the potential impacts (See CEQA Guidelines, Section 15126.4(a)(1)(B)).*

Update 1/26/26 – CEQA Guidelines, Section 15126.4(a)(1)(B): Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures shall not be deferred until some future time. Please clarify if all the recommended ground improvements could meet the provided foundation requirements for ground improvements, as such no comparison needs to be made?

Response:

We provided target settlement thresholds and bearing capacity for the design of ground improvements for the project in Section 7.8 of the referenced report. These performance standards are applicable to any ground improvement option that is considered for the project, so we do not consider specific standards for the different ground improvement options to be necessary. Additionally, the performance standards were evaluated by the project's structural engineer and design team. We understand that ground improvements consisting of aggregate piers have been selected for the project and that the ground improvement design achieves the performance standards (see Reference No. 2). Therefore, additional evaluation or comparison of the mitigation options is unnecessary at this time assuming that the referenced ground improvement plans are implemented.

Comment 00262: *Several possible measures are proposed to attenuate soil liquefaction and related phenomena. Indicate if these measures would cause significant environmental effects (See CEQA Guidelines, Section 15126.4(a)(1)(D)).*

Update 1/26/26 – The project's geotechnical consultant must address this comment because they provided the liquefaction recommendations for attenuation of soil liquefaction. The geotechnical consultant must address any environmental impacts that could be caused by the recommended methods for reducing the effects of soil liquefaction. For example but not limited to air quality/noise, groundwater quality/hydrology, or transportation of heavy equipment.

Response:

From a geotechnical standpoint, we opine that the proposed ground improvements would not create significant environmental impacts (including air quality/noise, groundwater quality/hydrology, or transportation of heavy equipment) and would be generally consistent with the typical impacts associated with construction.

Comment 00263: *The environmental consultant should determine if the proposed ground improvement measures are project elements or impact mitigation measures.*

Update 1/26/26 – The project's geotechnical consultant must address this comment because they provided the liquefaction recommendations for attenuation of soil liquefaction including ground improvements.

Response:

The proposed ground improvements for the subject site are features that would be required to meet design standards. Therefore, it is our professional opinion that the proposed ground improvement measures would be considered project elements from a geotechnical standpoint and based on the CEQA definitions.

Comment 00288: *Submit geotechnical addendum that specifically addresses the Draft Environmental Impact Report (DEIR) for the 1129794 Project. The project's geotechnical consultant (Geocon) must indicate that they have reviewed the referenced (or revised) DEIR and are in agreement with the geologic and geotechnical information contained in the document.*

Response: We have reviewed the revised Draft Environmental Impact Report (DEIR), and it is our professional opinion that the geologic and geotechnical information contained in the document is in accordance with our referenced geotechnical investigation (see Reference No. 1).

If you have any questions regarding this response, or if we may be of further service, please contact the undersigned at your convenience.

GEOCON INCORPORATED



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