

**DATE ISSUED:** September 21, 2004

**REPORT NO. PC-04-056**

**ATTENTION:** **Planning Commission, Agenda of September 30, 2004**

**SUBJECT:** Sunset Cliffs Natural Park Master Plan. MASTER PLAN ADOPTION to define long-range improvements for management of the 68-acre Sunset Cliffs Natural Park in accordance with the goals of the Master Plan. Implementation of improvements would occur in phases based on funding availability. Project elements subject to future environmental review and permitting include a comprehensive drainage/erosion control plan, a native plant preservation and revegetation program, a system of marked pedestrian trails with observation points and signage, improved beach access, traffic and parking improvements, recontouring and revegetation the existing ballfield into a passive open space, and demolition of the Loma Land and Ladera Street Properties with possible retention and adaptive re-use of the Theosophical Society Cabin if designated as an historical resource.

**APPLICANT:** City of San Diego Park and Recreation Department.

**SUMMARY**

**Issue(s)** - Should the Planning Commission approve the Master Plan for the 68-acre resourced-based regional park, Sunset Cliffs Natural Park, in the Peninsula Community Plan?

**Staff Recommendation:**

1. CERTIFY Master Environmental Impact Report No. 91-0644 and ADOPT Mitigation, Monitoring and Reporting Program; and
2. ADOPT the Master Plan.

**Recommendations** - The Sunset Cliffs Recreation Council considered the project at their meeting on October 1, 2001 and voted to approve the project 29-16 with amendments summarized below:

- 1) Remove the existing ball field and restore the area to natural vegetation
- 2) Eliminate any additional Beach Access and if the Ladera Street stairs can not be replaced in the future, then there would be no beach access at any location.
- 3) No permanent showers or restrooms constructed in the park.

On February 5, 2002 the Coastal Area Committee recommended approval of the proposed Master Plan with amendments summarized below:

- 1) Remove the existing ball field and restore the area to natural vegetation
- 2) No permanent showers or restrooms constructed in the park.

On December 10, 2003 the Design Review Committee recommended approval of the proposed Master Plan with the following recommendations:

- (1) Incorporate the revised beach access language recommended by staff
- (2) Add language to the master plan suggesting that the Park and Recreation Department work towards expansion of parkland and elimination of private easements across the park
- (3) Add language to the master plan discussing subsurface hydrology (piping etc.) and its effects.
- (4) Confirm needs of the Life Guards for emergency access to the cliffs
- (5) Eliminate the language on page 32
- (6) Make a destination at the south end of the trail and investigate a connection to the Loop road for the bike trail.
- (7) Add photos or drawings of trails (such as Torrey Pines) showing the character of the trails including examples of barriers that keep people out of sensitive areas.
- (8) Recommend construction of a minimal sized, permanent comfort station at the lower parking lot.

On February 19, 2004, this project was presented to the Park and Recreation Board. The item was continued at that time until the Final EIR could be made available to the Park and Recreation Board members.

On June 17, 2004 the Park and Recreation Board approved the Master Plan with the following recommendation:

Allow use of the existing athletic field while working with the community to identify another suitable field. Time frame to accomplish this should not exceed two years.

Vote: 7-0-1

**Environmental Review** – A Master Environmental Impact Report (MEIR) was prepared for the project as finalized May 18, 2004 in accordance with the State of California Environmental Quality Act (CEQA) Guidelines. A Mitigation, Monitoring, and Reporting Program (MMRP) will be implemented which will reduce, to below a level of significance, the potential environmental impacts identified from the environmental review process for the following resource areas: land use, geology, hydrology, water quality, biology, visual quality/landform alteration, public safety, paleontological resources, historical resources (archaeology), historical resources (architectural), and cumulative impacts. All identified impacts would be mitigated to below a level of significance; no significant unmitigated impacts would remain. Therefore, no Findings or Statement of Overriding Considerations are necessary.

**Fiscal Impact** – No Fiscal Impact would occur at the Master Plan Level

**Code Enforcement Impact** - None with this action.

**Housing Impact Statement** - Inclusionary Housing Ordinance, adopted May 20, 2003 effective July 3, 2003, requires all new residential development of two units or more to provide affordable housing. No new residential construction is proposed.

## **BACKGROUND**

Dedicated in 1983, Sunset Cliffs Natural Park is a 68-acre resource-based regional park stretching along the Pacific Ocean bordering the western edge of Point Loma. A 50 acre portion of the park is a designated Multi-Habitat Planning Area, and links the 640-acre Point Loma Ecological Reserve beginning at the Navy property to the south.

The planning process for this park began in the early 1980s. The Coastal Area Committee appointed the Sunset Cliffs Natural Park (SCNP) Advisory Committee in 1987. The committee was formalized as the SCNP Recreation Council in 1988. The first Draft master Plan was prepared in 1991. Subsequent Draft Master Plans were prepared in 1997, 2001, and the current Master Plan dated June, 2004.

The Master Plan addresses long-term needs to fulfill the goal to "Create a park. . . free from the

effects of man. . . intended to inspire the user to reflect on the grandeur of the sea, and beauty of

the cliffs that are Point Loma." Implementation of improvements would occur in multiple phases based on funding availability. Additional environmental review and permits are required for the development permits associated with individual projects to implement the Master Plan.

The Draft Master Environmental Impact Report was prepared and submitted for a 45-day public review period from October 1, 2003 through November 14, 2003 in accordance with the State CEQA Guidelines 15087. At the request of the Sunset Cliffs Natural Park Recreation Council, the public comment period was extended 14 days to conclude on Tuesday, December 2, 2003 allowing additional time for the Recreation Council and community to meet and finalize their comments. The document was finalized on May 18, 2004.

### **PROJECT DESCRIPTION:**

Sunset Cliffs Natural Park is located approximately five miles west of downtown San Diego along the western shoreline of the Point Loma Peninsula. The Park is bordered to the north by the Adair Street/Sunset Cliffs Boulevard intersection. The site is bordered to the west by the Pacific Ocean and to the east by Sunset Cliffs Boulevard, single-family residential uses, and the Point Loma Nazarene University (PLNU). The site is bordered to the south by the Naval Base Point Loma (historically known as Fort Rosecrans Military Reservation). See Attachment 1

The Master Plan is divided into two sections. The 18-acre Linear Park section includes the natural cliff and street parking areas that extend approximately 1.25 miles south to the Sunset Cliffs Boulevard/Ladera Street intersection. The 50-acre Hillside Park includes the natural cliff and hillside area that extends from the Sunset Cliffs Boulevard/Ladera Street intersection approximately 0.5 miles south to the northern border of the military reservation. The location is illustrated on the Aerial Photo, see Attachment 2.

Current elements within the Linear Park consist of parking areas and pedestrian trails with recreational uses generally consisting of jogging, surfing, fishing, tide pooling, and bicycling. The Hillside Park currently consists of upper and lower parking lots, informal trails, an athletic field, and seven structures. The Hillside Park is primarily used for passive recreation such as surfing hiking, and jogging. However, the 1.4 acre athletic field, in Hillside Park, is used for active recreation such as softball practice, intramural sports, and unorganized neighborhood Park use.

The SCNP Master Plan provides recommendations and guidelines for land uses proposed within the Park with a primary goal to:

“Create a park where people can enjoy San Diego’s natural coastal environment as it once was, free from the effects of man and intended to inspire the user to reflect on the grandeur of the sea, and beauty of the cliffs that are Point Loma,”  
Sunset Cliffs Natural Park Recreation Council (SCNPRC).

### **ENVIRONMENTAL ANALYSIS:**

A Master Environmental Impact Report (MEIR) was prepared for the project in accordance with the CEQA State Guidelines in Article 11.5 of the California Code of Regulations, Title 14,

Chapter 3, to address the potential environmental impacts resulting from, or related to, implementation of the Master Plan for the Sunset Cliffs Natural Park. The MEIR was finalized May 18, 2004. A Mitigation, Monitoring, and Reporting Program (MMRP) will be implemented to reduce, to below a level of significance, the potential environmental impacts identified from the environmental review process for the following resource areas: land use, geology, hydrology, water quality, biology, visual quality/landform alteration, public safety, paleontological resources, historical resources (archaeology), historical resources (architectural), and cumulative impacts. Each of these impact areas are summarized below and further discussed in the attached Master Environmental Impact Report.

It is expected that the following significant impacts would be fully mitigated with implementation of the proposed Mitigation, Monitoring, and Reporting Program (MMRP).

Land Use: Land use considerations were evaluated for consistency with the Multiple Species Conservation Plan (MSCP), the Coastal Bluffs and Beaches Guidelines, agreements with the Point Loma Nazarene University (PLNU), the Peninsula Community Plan and Local Coastal Program and the San Diego Association of Governments Shoreline Preservation Strategy. The proposed Master Plan improvements are generally consistent with these broader land use plans. The project could conflict with an aspect of the Peninsula Community Plan objectives regarding water quality due to potential impacts from some of the park improvements. However, the EIR defines adequate mitigation to ensure the impacts would be below a level of significance. The MEIR analyzes impacts from eliminating active use of the ballfield and eventually revegetating the area with native plant material. This change in land use would bring the site in alignment with the goals of the Master Plan but would impact the existing use by PLNU. Mitigation measures required for impacts to water quality, erosion, and geology/soils would be implemented to reduce long- and short-term impacts to water quality and erosion and to bring the Master Plan into conformance with the Community Plan goals.

Housing: Eight City owned structures are on the site. These structures can not continue as rentals once the Master Plan is approved, per Charter Section 55, which does not allow rental use of City parkland. One structure, the Corbin House (Theosophical Society Cabin) will require further Historical Review to determine the appropriate action.

The remaining structures (Ladera Street and Loma Land) are not historically significant and are substandard. Four of these remaining structures are concrete block. During the preparation of the Master Plan each of these units was considered for relocation and or reuse per the recommendation of the Peninsula Community Plan. As part of the review of these structures,

staff has determined that relocation of the remaining structures could pose significant environmental concerns due to their proximity to steep, unstable cliffs. Further, there is a

potential impact to existing native habitat related to the large equipment required to relocate the structures. The Loma Land properties are poorly located for reuse. They are remotely located on a gravel road via access through Point Loma Nazarene University. All of the structures are substandard for any type of public use and served by septic. The location of the Ladera Street properties invite vandalism and disrupts the natural park setting. If the units are removed, the process would include salvage of the reusable building materials and careful attention to protection of the sensitive coastal environment as outlined in the MMRP.

Geology: Implementation of park improvements such as the trail system, observation points, and parking could impact, or be impacted by geological resources such as sea caves, cliffs, and/or overhangs. Proposals for drainage improvements, erosion control, and beach access improvements could also result in, or be affected by, geological features. Mitigation measures have been identified to ensure project elements are designed to be either located outside areas of instability, or designed following recommendations of a site-specific geotechnical evaluation and erosion control plan.

Hydrology: The Master Plan calls for initiation of a comprehensive drainage study to determine and eliminate the long-term erosion problems in the park and to address short-term erosion control measures. A detailed drainage study would be conducted to evaluate and present the best options to reduce and/or eliminate the on-going erosion and minimize impacts to beach erosion

Water Quality: Parking lot and park improvements could continue to contribute to water quality impacts from construction and other runoff. Future remediation at the landfill and burn ash sites could impact water quality. Water quality would eventually be improved through reduction of significant on-going erosion. Site-specific Best Management Practices and a Storm Water Pollution Prevention Plan would be developed for each project-specific element of the Master Plan implementation.

Biology: Project implementation could result in direct loss of 2.6 acres (0.8 acres of Tier I habitat such as disturbed Southern Maritime Chaparral; 0.4 acres of Tier II habitat such as Disturbed, Restored, and/or Coastal Sage Scrub; 0.2 acres of Tier III non-native grassland; and 1.2 acres of Tier IV habitat such as ruderal and disturbed habitat). Impacts could include direct impacts within the Multi-Habitat Planning Area (MHPA), and potential direct impacts to two sensitive native plant species (neither of which are federally- or state-listed, but are rare or endangered according to the California Native Plant Society designation). Indirect impacts could occur to beach and the intertidal habitat.

A Native Plant Preservation and Revegetation program would be developed and implemented by a qualified biologist in accordance with City of San Diego Biology Guidelines. Additional surveys for sensitive vegetation would be conducted in the spring time. Suitable soil would be imported as needed to help establish native plant communities. Erosion control measures would

be implemented to minimize indirect impacts to the intertidal community. Disturbance to MHPA lands would be mitigated by conforming to MSCP guidelines.

Visual Quality/Landform Alteration: Construction of beach access and regrading of eroded areas could impact visual quality. Design of beach access would require additional environmental review and evaluation to minimize visual impacts.

Public Safety: Environmental remediation of the landfill and burn ash sites could result in public exposure to hazardous waste sites. Future environmental remediation options would be identified and implemented with additional environmental review to ensure the design and implementation would further public safety and health goals without exposing park users to hazardous waste.

Paleontological Resources: Park improvements could involve excavation into the Point Loma and Bay Point geologic formations which have moderate to high potential to contain significant paleontological resources. Recontouring eroded drainage areas could also impact access to paleontological resources. A detailed MMRP has been developed to monitor for paleontological resources when undertaking park improvements.

Historical Resources (Archaeology): Substantial investigation was conducted on the known archaeological sites that exist within the Park and that could be impacted directly and indirectly by park improvements. A detailed MMRP has been developed to monitor for archaeological resources when undertaking park improvements. Known archaeological sites would be further evaluated and project features such as trails or observation areas designed to avoid or minimize impacts to known archaeological sites.

Historical Resources (Architectural): The Loma Land and Ladera Street Properties were evaluated for potential historical significance. Only one structure, the Theosophical Society Cabin (currently known as the Corbin House), is potentially associated with the Theosophical Society Historic District. Further consultation with the Historic Resources Board would be conducted to determine appropriate management of this potential resource. The other structures would be vacated and demolished as part of the Master Plan implementation.

Cumulative Impacts: Significant, but mitigated, cumulative impacts have been identified to the following resource areas: hydrology/water quality, biological, paleontological, and historical resources. Mitigation identified in the Final MEIR would ensure that the cumulative impacts are reduced to below a level of significance.

**SIGNIFICANT UNMITIGATED IMPACTS:** No significant unmitigated environmental impacts have been identified. All potential environmental impacts have been reduced to below a level of significance with mitigation.

**PROJECT RELATED ISSUES:**

During the CEQA public review period, sixteen comment letters containing 314 comments were received on the draft MEIR. Over half of the comments were provided by the Sunset Cliffs Natural Park Recreation Council. In accordance with the State CEQA Guidelines 15088, the City of San Diego evaluated and responded to all written comments received. Many of the comments resulted in clarifying changes as reflected in the Final MEIR. Disposition of all comments is found in the Response to Comment document which is part of the final MEIR.

The following reflects the primary issues raised during public review:

- Parking adequacy – Several *commenters* noted discrepancy between the actual parking availability and the numbers identified in the Draft. As a result, additional review was conducted and the EIR corrected to reflect the actual number of parking spaces.
- Traffic/pedestrian safety – Several *commenters* requested further evaluation of parking.
- Lot redesign and the potential safety impacts resulting therefrom. As the Master EIR does not propose project-specific parking lot reconfiguration, a detailed analysis has been deferred once a project is proposed.
- Drainage and runoff – A primary, underlying theme in the comments is the on-going erosion and drainage issues in the Park and the disagreement among the stakeholders regarding the source and solution. As disclosed in the Draft EIR, a separate drainage study would be conducted, subject to additional environmental review, to more fully analyze and propose solutions to the erosion which is currently degrading the Park.
- Athletic field removal – Perhaps the most controversial of all impacts is the current use of the athletic field for active recreation in a passive park and Multiple Habitat Planning Area (MHPA). During the process of preparing the Master Plan, it was decided to eliminate active recreational use of the field and return it to a naturalized state in accordance with the MEIR Revegetation Plan. Understanding that current users of the athletic field will be displaced, staff will work with the community and pursue alternative locations.
- Future environmental review – The EIR has identified need for future environmental review to more fully analyze the potential for impacts from future projects. Among these future environmental studies include:
  - Drainage Study
  - Erosion Control Study
  - Traffic/Parking Study
  - Biological Studies (e.g., Springtime survey, tidepool study, revegetation program)
  - Archaeological Study



**CONCLUSION:**

After considerable time and effort, the community and stake holders have reached a compromise regarding the primary issues. The Park and Recreation Department recommend adoption of the Master Plan. Development Services Department recommends certification of the Master Environmental Impact Report.

**ALTERNATIVES**

1. Recommend that City Council approve the Sunset Cliffs Natural Park Master Plan with modifications.
2. Recommend that City Council deny the Sunset Cliffs Natural Park Master Plan.

**Respectfully submitted,**

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Park & Recreation Department**

**Attachments:**

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| 1. Regional Map                | 5. Agreements: Point Loma Nazarene University |
| 2. Aerial Photograph           | 6. Master Plan                                |
| 3. Community Plan Land Use Map | 7. Master Environmental Impact Report         |
| 4. Project Data Sheet          |   |