



**COMMUNITY DEVELOPMENT DEPARTMENT**  
825 IMPERIAL BEACH BOULEVARD • IMPERIAL BEACH, CALIFORNIA 91932

**NEGATIVE DECLARATION**

**SEPTEMBER 2, 2009**

**A. PROJECT NAME/PROJECT DESCRIPTION/APPLICANT/PROJECT LOCATION:**

**Year 2005-2010 Imperial Beach Housing Element (MF 692):** The Housing Element is an integral component of the City's General Plan. The Housing Element addresses existing and future housing needs of all types for persons of all economic groups in the City. The Housing Element is a tool for use by citizens and public officials in understanding and meeting the housing needs in Imperial Beach. It consists of: a review of the previous element's goals, policies, programs, and objectives to ascertain the effectiveness of each of these components, as well as the overall effectiveness of the Housing Element; an assessment of housing needs and an inventory of resources and constraints related to the meeting of these needs; an analysis and program for preserving assisted housing developments; a Statement of community goals, quantified objectives, and policies relative to the preservation, improvement and development of housing; and a program which sets forth a five-year schedule of actions that the City is undertaking or intends to undertake, in implementing the policies set forth in the Housing Element.

**Coastal Jurisdiction:** The City of Imperial Beach is in the California Coastal Zone. However, Public Resources Code Section 30500.1. of the California Coastal Act provides that: "No local coastal program shall be required to include housing policies and programs."

**B. ENVIRONMENTAL FINDINGS:**

**Find:** that this Negative Declaration reflects the decision-making body's independent judgment and analysis; that the decision-making body has, pursuant to CEQA Guidelines Section 15074(b), reviewed and considered the information contained in this Negative Declaration and the comments received during the public review period; that revisions in the project plans or proposals made by or agreed to by the project applicant, pursuant to CEQA Guidelines Section 15070(b)(1), would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and that, on the basis of the whole record before the decision-making body (including this Negative Declaration) there is no substantial evidence that the project as proposed, as conditioned, or as revised, will have a significant effect on the environment.

This Negative Declaration (ND) is comprised of this document along with the Environmental Initial Study, which, pursuant to CEQA Guidelines Section 15063(f) may consist of the Environmental Information Form and the Environmental Checklist Form (Appendix G). This ND considered the potential cumulative impacts of the project, and any other past, present and reasonably foreseeable future projects, and it incorporates,

pursuant to CEQA Guidelines Section 15150, the Environmental Impact Report prepared for 1994 Imperial Beach General Plan.

The draft Negative Declaration was prepared and previously advertised for public review from November 6, 2008 to December 6, 2008 in accordance with the California Environmental Quality Act (CEQA) and the draft ND was routed for state agency review through the Clearinghouse (SCH# 2008091108) from September 22, 2008 to October 21, 2008. No comments were received. The draft ND will be considered for adoption on September 2, 2009 as the final Negative Declaration.

This document is considered a draft until it is adopted by the appropriate City of Imperial Beach decision-making body as lead agency.

**C. MITIGATION MEASURES:**

**None required.**

**D. ADOPTION:**

This Negative Declaration (SCH#2008091108) was adopted and the afore-mentioned CEQA findings were made by the Imperial Beach City Council on September 2, 2009.

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James Nakagawa, AICP  
Imperial Beach City Planner

Attachments:

1. Environmental Initial Study/Negative Declaration

# Environmental Initial Study Negative Declaration

## Imperial Beach 2005-2010 Housing Element Update of the General Plan



**Imperial Beach, California**

**September 2, 2009**

Prepared by



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<b>INITIAL STUDY</b>
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**I. BACKGROUND**

1. Project Title: City of Imperial Beach General Plan, Housing Element Update
2. Lead Agency Name and Address: City of Imperial Beach  
825 Imperial Beach Boulevard  
Imperial Beach, CA 91932
3. Contact Person and Phone Number: Jim Nakagawa  
City Planner  
(619) 628-1355
4. Project Location: The City of Imperial Beach
5. Project Sponsor's Name and Address: City of Imperial Beach  
825 Imperial Beach Boulevard  
Imperial Beach, CA 91932
6. General Plan Designation: N/A
7. Zoning: N/A
8. Project Description Summary:

The project involves the update of the Housing Element of the City of Imperial Beach General Plan to include 87 new housing units.

**II. SOURCES**

The following documents are referenced information sources utilized by this analysis:

1. City of Imperial Beach General Plan and Coastal Plan, June 1994.
2. City of Imperial Beach General Plan Draft Environmental Impact Report, July 1994.
3. City of Imperial Beach Housing Element of the General Plan, Public Review Draft, September 2006.

**III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

<input type="checkbox"/> <b>Aesthetics</b>	<input type="checkbox"/> <b>Agriculture</b>	<input type="checkbox"/> <b>Air Quality</b>
<input type="checkbox"/> <b>Biological Resources</b>	<input type="checkbox"/> <b>Cultural Resources</b>	<input type="checkbox"/> <b>Geology/Soils</b>
<input type="checkbox"/> <b>Hazards &amp; Hazardous Materials</b>	<input type="checkbox"/> <b>Hydrology/Water Quality</b>	<input type="checkbox"/> <b>Land Use &amp; Planning</b>
<input type="checkbox"/> <b>Energy &amp; Mineral Resources</b>	<input type="checkbox"/> <b>Noise</b>	<input type="checkbox"/> <b>Population &amp; Housing</b>
<input type="checkbox"/> <b>Public Services</b>	<input type="checkbox"/> <b>Recreation</b>	<input type="checkbox"/> <b>Transportation &amp; Circulation</b>
<input type="checkbox"/> <b>Utilities/Service Systems</b>	<input type="checkbox"/> <b>Mandatory Findings of Significance ✖ None</b>	

**IV. DETERMINATION**

On the basis of this initial study:

- I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the applicant. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier General Plan EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier General Plan EIR, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Jim Nakagawa, AICP, City Planner

City of Imperial Beach

## **V. BACKGROUND AND INTRODUCTION**

This Initial Study provides an environmental analysis pursuant to the California Environmental Quality Act (CEQA) of 1970, as amended, for the proposed 2005-2010 City of Imperial Beach General Plan Housing Element Update (proposed project).

The project site is the City of Imperial Beach Planning Area. Imperial Beach, the “Most Southwesterly City in the Continental United States,” is one of 18 incorporated cities located within San Diego County. The City is bordered on the north by a U.S. Naval Communications Station within the City of Coronado’s jurisdiction and the southern shore of San Diego Bay, on the east by the City of San Diego, on the south by the U.S./Mexican border, and on the west by the Pacific Ocean. Imperial Beach is a 4.5 square mile city. Imperial Beach’s coastal setting and Mediterranean climate provide a unique and attractive living environment. The City is almost entirely built out with a few vacant parcels. Future development will primarily take place through upgrading and reuse of existing parcels and possible reuse of Ream Field.

As required by State law (Section 65580 – 65589.8 of the California Government Code), the proposed project includes an update of the City of Imperial Beach’s General Plan Housing Element for the years 2005-2010. The update performs the following functions: identifies residential sites adequate to accommodate a variety of housing types for all income levels and needs of special population groups defined under State Law (Section 65583 of the California Government Code); analyzes governmental constraints to housing maintenance, improvement and development; addresses conservation and improvement of the condition of the existing affordable housing stock; and outlines policies to promote housing opportunities for all persons.

In preparing this Initial Study, the City has relied on the 1994 Imperial Beach General Plan and the Environmental Impact Report prepared with the General Plan. Pursuant to Section 21083.3 of the Public Resources Code, the City incorporates by reference these documents, which are available at the City Offices, 825 Imperial Beach Boulevard, Imperial Beach, CA, 91932.

The Initial Study focuses on whether the proposed project may cause significant effects on the environment that were not examined in the General Plan EIR. In particular, consistent with Section 21083.3, this initial study is intended to assess any effects on the environment that are peculiar to the proposed project or to the parcels on which the project would be located and were not addressed or analyzed as significant effects in the General Plan EIR, or which substantial new information shows will be more significant than described in the General Plan EIR.

Implementation of mitigation measures identified in the General Plan EIR that apply to the proposed project will be required as part of the project. These mitigation measures may be further clarified to address impacts specific to this project. Implementation of project-specific mitigation measures for new, potentially significant impacts that not previously identified in the General Plan EIR will also be required as part of the proposed project.

## **VI. PROJECT DESCRIPTION**

The Housing Element is an integral component of the City’s General Plan. The Housing Element addresses existing and future housing needs of all types for persons of all economic groups in the City. The Housing Element is a tool for use by citizens and public officials in understanding and meeting the housing needs in Imperial Beach.

The State Legislature has mandated that a Housing Element be included in every General Plan since 1969. The Housing Element is one of the seven required elements in a General Plan. Article 10.6, Section 65589-65589.8, Chapter 3 of Division 1 of Title 7 of the Government Code sets forth the legal requirements for a Housing Element and encourages the provision of affordable and decent housing in all communities to meet Statewide goals. Specifically, Section 65580 states the Housing Element shall consist of “[...] an identification and analysis of existing and projected housing needs and a Statement of goals, policies, quantified objectives, financial resources and scheduled programs for the preservation, improvement, and development of housing.” The Housing Element must also contain a five-year housing plan with quantified objectives for the implementation of the goals and objectives described in the Housing Element. State Law requires the Housing Element be updated every five years.

The City of Imperial Beach’s current Housing Element Draft is consistent with all Elements of the City’s General Plan. This Initial Study evaluates the environmental effects of the new 2005-2010 Imperial Beach Housing Element.

Government Code Section 65583 requires that the Housing Element include the following components:

- ❑ A review of the previous element’s goals, policies, programs, and objectives to ascertain the effectiveness of each of these components, as well as the overall effectiveness of the Housing Element.
- ❑ An assessment of housing needs and an inventory of resources and constraints related to the meeting of these needs.
- ❑ An analysis and program for preserving assisted housing developments.
- ❑ A Statement of community goals, quantified objectives, and policies relative to the preservation, improvement and development of housing.
- ❑ A program which sets forth a five-year schedule of actions that the City is undertaking or intends to undertake, in implementing the policies set forth in the Housing Element.

Several factors influence the degree of demand for housing in the City of Imperial Beach. Four major “needs” categories considered in the Housing Element include: housing needs resulting from overcrowding; housing needs that result when households are paying more than they can afford for housing; housing needs of “special needs groups” such as the elderly, large families, female heads of households, households with persons with disabilities, and the homeless; and housing needs resulting from population growth in the City and surrounding region.

California’s Housing Element law requires that each city and county develop local housing programs designed to meet its “fair share” of housing needs for all income groups. The “fair share” allocation seeks to ensure that each jurisdiction accepts responsibility for the housing needs of not only its current residents, but also for those households who might be reasonably expected to reside within the jurisdiction. A jurisdiction’s “fair share” of regional housing need is the number of additional dwelling units that would be required to accommodate the anticipated growth in households, replace expected demolitions and conversions of housing units to non-housing uses, and achieve a future vacancy rate that allows for the healthy functioning of the housing market.

The SANDAG 2005 Housing Plan determined that 25.5 percent of the households in Imperial Beach are classified as very low-income, and an additional 17.1 percent of households have

been determined to be low-income. The assessment must include an analysis of the housing need for all income groups including the 18.9 percent of households with moderate incomes and the 41.5 percent with above moderate incomes.

Construction needs are derived from SANDAG population and household growth projections. The income group proportions are then applied toward the construction need, which results in a goal for the number of housing units by income group within the City of Imperial Beach. For the period 2005 to 2010, the City of Imperial Beach has been given a construction need of 87 new housing units. The specific need by income group is depicted in the following table:

**TABLE 1  
CONSTRUCTION NEED (2005-2010)**

<b>Income Group/Percent of Households</b>	<b>Construction Need</b>	<b>Typical Annual Construction Needs</b>
Very Low – 25.5%	13	3
Low – 17.1%	9	2
Moderate – 18.9%	16	3
Above Moderate – 41.5%	49	10
<b>TOTAL</b>	<b>87</b>	<b>17</b>
Source: 2005 Regional Housing Allocation Plan, SANDAG		

### **Discretionary Action**

Implementation of the proposed project would require the following discretionary actions by the City of Imperial Beach Planning Commission/City Council:

- Approval of a Negative Declaration; and
- Approval of the new 2005-2010 Housing Element for the City of Imperial Beach.

### **VII. ENVIRONMENTAL CHECKLIST**

The following Checklist contains the environmental checklist form presented in Appendix G of the CEQA Guidelines. The checklist form is used to describe the impacts of the proposed project. A discussion follows each environmental issue identified in the checklist. Included in each discussion is project specific mitigation measures deemed appropriate and recommended as part of the proposed project.

For this checklist, the following designations are used:

**Potentially Significant Impact:** An impact that could be significant, and for which no mitigation has been identified. If any potentially significant impacts are identified, and EIR must be prepared.

**Potentially Significant Unless Mitigation Incorporated:** An impact that requires mitigation to reduce the impact to a less-than-significant level.

**Less-Than-Significant Impact:** Any impact that would not be considered significant under CEQA relative to existing standards.

**No Impact:** The project would not have any impact.

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact	
<b>I. AESTHETICS.</b>					
<i>Would the project:</i>					
a.	Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
d.	Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>

**Discussion**

a-c. Scenic resources in Imperial Beach include a large number and variety of vistas and natural settings (i.e., from nearly all sections of the community there are panoramic views); a sense of terrain or location – that is an identifiable sense of enclosure created by the natural geography and a strong focal point in the Seacoast area, a strong pattern of development evidenced by the concentration of structures and circulation facilities and the existence of extensive open space. New development would be infill development and will be visible from locations within the City and existing urban landscape. The City’s General Plan goals and policies include fostering the idea that the visual quality of the City’s environment shall be preserved and enhanced for the aesthetic enjoyment of both residents and visitors and the economic well-being of the community. Development of neighborhoods, streets and individual properties should be pleasing to the eye, rich in variety, and harmonious with existing development. (City of Imperial Beach General Plan, Section D, pD-5).

The Housing Element Update anticipates the need for 87 housing units in the City for the five year period from 2005 to 2010. Without identifying the location of residential development, the potential impact of development of a scenic vista, scenic resources, historic buildings, or visual character of the City is impossible to determine. Furthermore, because the Housing Element is a policy level document, the Housing Element does not include any site specific designs or proposals that would enable an assessment of potential site specific visual impacts that may result with future housing development proposals. A case-by-case design review of future housing projects would be carried out to ensure that existing views and aesthetic conditions are preserved, and that the projects are consistent with all General Plan goals, objectives, and policies. Therefore, adherence to such requirements would reduce potential impacts associated with this issue to a ***less-than-significant*** level.

- d. Development of residential uses in accordance with applicable provisions of the City's Housing Element Update would create new sources of light and glare in the City. The increased density and intensity of residential uses would increase the amount of light and glare in developed areas (from exterior lighting, street lighting, vehicular lighting, and interior lighting visible from the outside). To minimize potential light and glare impacts, future development proposed by the Housing Element Update would be required to comply with applicable policies governing light and glare outlined in the Design Element in the General Plan, City of Imperial Beach standards, and/or requirements mandated during the environmental review if individual residential developments. Adherence to these standards and/or requirements would reduce potential light and glare impacts to a **less-than-significant** level.

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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**II. AGRICULTURE RESOURCES.**

*In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1977) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:*

a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
c.	Involve other changes in the existing environment, which due to their location or nature, could individually or cumulatively result in loss of Farmland to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>

**Discussion**

- a,c. According to the Imperial Beach General Plan no lands within the City Limits are designated for Agriculture use. In addition, according to the San Diego County 2004 Annual Crop Report, the prime crop in San Diego County was indoor flowering and foliage plants, which are not located in the City of Imperial Beach.

In addition, the proposed project identifies a housing need of only 87 housing units within the City, which can be accommodated in existing vacant residential land and the commercial land that would be rezoned to residential to meet the RHNA objective and would not require further conversion of farmland. Furthermore, because the Housing

Element is a policy level document, the Housing Element does not include any site specific agricultural impacts that may result in future housing development proposals; a case-by-case environmental review of future housing projects would be necessary. Therefore, the proposed project would result in **no impact** to agricultural resources.

- b. None of the land within the existing City boundary or sphere of influence is subject to the Williamson Act Contract. All of the potential housing sites identified within the Housing Element are within the City. Individual development projects necessary to satisfy the housing need identified in the Housing Element update would be reviewed to ascertain potential impacts with existing agricultural zoning or agricultural use. Adherence to applicable City standards related to agricultural zoning, use, or Williamson Act lands would reduce potential impacts related to this issue to a **no impact** level.

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<b>III. AIR QUALITY.</b>				
<i>Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:</i>				
a.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### **Discussion**

- a,c. The climate of Imperial Beach is largely controlled by the strength and position of the semi-permanent high pressure center over the Pacific Ocean. Both the onshore flow of marine air and the nocturnal winds are accompanied by characteristic temperature inversion conditions that further control the rate of air pollution dispersal throughout the air basin. Because coastal areas are well ventilated by fresh breezes during the daytime, they generally do not experience the same frequency of air pollution problems found in some areas east of Imperial Beach. Unhealthy air quality within the San Diego Air Basin (SDAB) southern coastal communities may occur at certain times during the

summer during periods of limited localized stagnation. These occur mainly in conjunction with the occasional intrusion of polluted air from the Los Angeles Basin in to the County. Localized elevated pollution levels may also occur in winter during calm stable conditions near freeways, shopping centers or other major traffic sources, but such clean air violations are highly localized in space and time.

Since 1970, air quality has been regulated at the Federal level under the Clean Air Act (CAA). The CAA authorized the U.S. Environmental Protection Agency (EPA) to set National Ambient Air Quality Standards (NAAQS) for air pollutants of nationwide concern. The EPA has established standards for six criteria air pollutants. These pollutants include ozone (O<sub>3</sub>), carbon monoxide (CO), nitrogen oxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), suspended particulate matter (PM<sub>10</sub>), and lead (Pb). PM<sub>2.5</sub> particulate matter has recently been added to this listing; however, data to document ambient conditions or quantify these emissions do not yet exist. Primary standards for air pollutants were established to protect public health, while secondary standards were established to protect the public welfare by preventing impairment of visibility and damage to vegetation and property.

The Federal Clean Air Act required that a plan be prepared for all airsheds that did not meet Federal standards. The San Diego Air Basin (SDAB) violates the ozone and carbon monoxide standards, this necessitating that a plan be developed outlining the stationary and mobile source of pollution controls to be undertaken to improve air quality. Independent of any Federally required plan, the California Clean Air Act mandates an air quality attainment plan. A year to year five percent air quality improvement standard is currently in effect in California. The State of California Air Resource Board Ambient Air Quality Standards are shown in Table 2.

**TABLE 2**  
**Ambient Air Quality Standards**

Pollutant	Averaging Time	State		Federal		
		Concentration	Method	Primary	Secondary	Method
Ozone (O <sub>3</sub> )	1 Hour	0.09 nppm (180 ug/m <sup>3</sup> )	Ultraviolet Photometry	--	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 ug/m <sup>3</sup> )		0.08 ppm (157 ug/m <sup>3</sup> )		
Respirable Particulate Matter (PM <sub>10</sub> )	24 hour	50 ug/m <sup>3</sup>	Gravimetric or Beta Attenuation	150 ug/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 ug/m <sup>3</sup>		50 ug/m <sup>3</sup>		
Fine Particulate Matter (PM <sub>2.5</sub> )	24 Hour	No Separate State Standard		65 ug/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 ug/m <sup>3</sup>	Gravimetric or Beta Attenuation	15 ug/m <sup>3</sup>		
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10mg/m <sup>3</sup> )	Non-Dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m <sup>3</sup> )	None	Non-Dispersive infrared Photometry (NDIR)
	1 Hour	20 ppm (23 mg/m <sup>3</sup> )		35 ppm (40 mg/m <sup>3</sup> )		
	8 Hour (Lake Tahoe)	6 ppm (7mg/m <sup>3</sup> )		--		
Nitrogen Dioxide (NO <sub>2</sub> )	Annual Arithmetic Mean	--	Gas Phase Chemiluminescence	0.053 ppm (100 ug/m <sup>3</sup> )	Same as Primary Standard	Gas Phase Chemiluminescence
	1 Hour	0.25 ppm (470 ug/m <sup>3</sup> )		--		
Sulfur Dioxide (SO <sub>2</sub> )	Annual Arithmetic Mean	--	Ultraviolet Fluorescence	0.030 ppm (80 ug/m <sup>3</sup> )	--	Spectrophotometry (Pararosaniline Method)
	24 Hour	0.04 ppm (105 yg/m <sup>3</sup> )		0.14 ppm (365 ug/m <sup>3</sup> )	--	
	3 Hour	--		--	0.5 ppm (1300 ug/m <sup>3</sup> )	
	1 Hour	0.25 ppm (655 ug/m <sup>3</sup> )		--	--	
Lead	30 Day Average	1.5 ug/m <sup>3</sup>	Atomic Absorption	--	--	--
	Calendar Quarter	--		1.5 ug/m <sup>3</sup>	Same as Primary Standard	High Volume Sampler and Atomic Asborption
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per kilometer – visibility of ten miles or more (0.07 – 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.		<b>No Federal Standards</b>		
Sulfates	24 Hour	25 ug/m <sup>3</sup>	Ion Chromatography			
Hydrogen Sulfide	1Hour	0.03 ppm (42 ug/m <sup>3</sup> )	Ultraviolet Fluorescence			
Vinyl Chloride	24 Hour	0.01 ppm (26 ug <sup>3</sup> )	Gas Chromatography			

Source: ARB Fact Sheet 39, 2006

- b. The nearest air quality measurements are made in downtown Chula Vista by the San Diego County Air Pollution Control District (APCD), the agency responsible for air quality planning, monitoring and enforcement in the SDAB. Table 3 summarizes seven years of monitoring data from the Chula Vista station. Progress towards cleaner air is seen in almost every pollution category. The only Federal Clean Air Standard that was exceeded throughout the seven year monitoring period was the hourly ozone standard which was exceeded an average of less than four times per year. The more stringent State standards for ozone and for 10-micron diameter respirable particulate matter (PM-10) were exceeded on a somewhat higher frequency; but, overall air quality in Chula Vista, as representative of Imperial Beach, is very good in comparison to other areas of the SDAB.

**Table 3**  
**Imperial Beach Area Air Quality Monitoring Summary**

<b>Pollutant/Standard</b>	<b>1986</b>	<b>1987</b>	<b>1988</b>	<b>1989</b>	<b>1990</b>	<b>1991</b>	<b>1992</b>
Ozone:							
1-Hour > 0.09 ppm	20	15	17	21	21	13	14
1-Hour > 0.12 ppm	2	2	4	7	3	3	4
1-Hour > 0.20 ppm	0	0	0	0	0	0	0
Max 1-Hour Conc. (ppm)	0.14	0.16	0.22	0.16	0.15	0.15	0.15
Carbon Monoxide:							
1-Hour > 20. ppm	0	0	0	0	0	0	0
8-Hour > 9. ppm	0	0	0	0	0	0	0
Max 1-Hour Conc. (ppm)	7	7	7	8	7	7	7
Max 8-Hour Conc. (ppm)	5.1	3.4	3.6	4.7	4.8	3.9	3.8
Nitrogen Dioxide:							
1-Hour > 0.25 ppm	0	0	0	1	0	0	0
Max 1-Hour Conc. (ppm)	0.14	0.15	0.21	0.16	0.13	0.12	0.15
Total Suspended Particulates:							
24-Hour $\geq$ 100 ug/m <sup>3</sup>	1/61	1/30	4/46	3/57	1/61	2/50	0/30
24-Hour > 260 ug/m <sup>3</sup>	0/61	0/30	0/46	0/57	0/61	0/50	0/30
Max. 24-Hour Conc. (ug/m <sup>3</sup> )	119	100	109	111	163	110	79
Particulate Sulfate:							
24-Hour $\geq$ 25. ug/m <sup>3</sup>	0/60	0/51	0/57	0/60	0/51	--	--
Max. 24-Hour Conc. (ug/m <sup>3</sup> )	17.6	13.3	17.2	16.5	16.8	--	--
Inhalable Particulates (PM-10):							
24-Hour > 50 ug/m <sup>3</sup>	3/51	5/61	3/56	7/61	7/62	7/60	2/60
24-Hour > 150 ug/m <sup>3</sup>	0/51	0/61	0/56	0/61	0/62	0/60	0/60
Max. 24-Hour Conc. (ug/m <sup>3</sup> )	104	68	58	69	67	73	54
Source: General Plan EIR							

### **Conclusions**

Implementation of the mitigation measures adopted in the Imperial Beach General goals and policies will reduce the air emission impacts. Because the build out projected by the Housing Element is consistent with the total build out projected under the General Plan, the conclusion of the General Plan EIR applies to the Housing Element update. The Housing Element Update anticipates the need for 87 housing units in the City for the five-year period from 2005-2010. The Housing Element is a policy level document and therefore does not include specific development proposals. Future development anticipated under the Housing Element shall comply with the density and intensity standards outlined in the Land Use Element and the City's current Zoning Ordinance. The City is diligent in its efforts to ensure that each future project is carefully reviewed to ensure consistency with Federal, State, and local air quality standards and consistent with the goals, policies, and standards established within the other elements of the

General Plan that are intended to protect air quality. Therefore, a case-by-case review of future housing projects would be necessary to ensure that air quality is protected and that the projects are consistent with all General Plan goals, objectives, and policies. Adherence to such standards and guidelines would reduce potential impacts related to this issue to a **less-than-significant** level.

d,e. The Housing Element Update contains policies and programs rather than specific projects. New development within the City must comply with the density and intensity standards outlined in the Land Use Element and the City's current Zoning Ordinance. A case-by-case review of future housing projects would be necessary to ensure that air quality is protected and that the projects are consistent with all General Plan goals, objectives, and policies. Furthermore, the construction of residences, in addition to the activities associated with the residences would not result in the creation of objectionable odors. Adherence to all applicable standards and guidelines would reduce potential impacts related to sensitive receptors to a **less-than-significant** level.

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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**IV. BIOLOGICAL RESOURCES.**

*Would the project:*

a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>	<input type="checkbox"/>
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>	<input type="checkbox"/>
c.	Have a substantial adverse effect on Federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>	<input type="checkbox"/>
d.	Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>	<input type="checkbox"/>

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>

**Discussion**

a-f. Imperial Beach can be divided into two general areas: the urbanized area and the undeveloped area. Approximately two-thirds of the City is presently developed. Little natural vegetation remains except in the Estuary. The domestic vegetation consists of landscaping, mainly ornamental trees, some street trees, shrubbery and a variety of ground covers. Due to the urbanized nature of this portion of the City, existing significant wildlife habitats are non-existent except in the Estuary. The types of wildlife that do exist are those that are in the Estuary, have adapted to or are compatible with urbanization and do not have to compete with man for survival.

The remaining undeveloped land is occupied by the Tijuana River National Estuarine Research Reserve which includes the Tijuana Slough National Wildlife Refuge and Border Field State Park. This portion of the City is still in its natural state, and native vegetation and wildlife that exist are abundant, life-supporting and in some cases very unique. The Reserve contains a highly variable system that may be best termed an "intermittent estuary". The estuary supports a range of natural plant and animal communities that are especially adapted to withstand the variable salinities that occur when sea and fresh waters mix and provides habitat for a variety of rare and endangered species. In February of 1986, a management plan was adopted for the estuary with protection of the resources and improvements to the overall health of the ecosystem as its highest priority.

Vegetation presently found in the Estuary include batis, salt grass, shoregrass, pickleweed, sand verbena, sea lavender, suaeda, alkali heath, and sea rocket. Wildlife presently found in the Estuary include great blue heron, double crested cormorant, American avocet, long-billed curlew, marbled bodwit, northern harrier, willet, dowitcher, black-bellied plover, western sandpiper, dunlin, light-footed clapper rail, Western snowy plover, California least tern, least Bell's verio, and black-necked stilt.

The Housing Element Update anticipates the need for 87 housing units in the City for the five-year period from 2005-2010. The Imperial Beach General Plan and accompanying Land Use Diagram have been developed with resource protection policies. Amending the City of Imperial Beach General Plan to include the Housing Element Update would not result in any significant impacts on biological resources because implementation of the goals, policies, and actions included in the Housing Element must be consistent with State and Federal laws and the goals, policies, and standards established within the

Land Use Element of the General Plan, which are intended to protect biological resources (Conservation and Open Space Element).

Because the Housing Element is a policy level document, the Housing Element does not include and site specific designs or proposals that would enable an assessment of potential site specific biological impacts that may result from future housing development proposals. Therefore, future case-by-case review of future housing projects would be necessary to assess the potential for environmental project specific biological impacts and project consistency with State and Federal regulations and all General Plan goals, objectives and policies. Adherence to such requirements would reduce potential impacts associated with this issue to a ***less-than-significant*** level.

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<b>V. CULTURAL RESOURCES.</b>				
<i>Would the project:</i>				
a.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion

a-d. Cultural resources are places, structures, or objects that are important for scientific, historic, and/or religious reasons to cultures, communities, groups, or individuals. Cultural resources include historic and prehistoric archaeological sites, architectural remains, engineering structures, and artifacts that provide evidence of past human activity. They also include places, resources, or items of importance in the traditions of societies and religions.

The majority of the project area is developed with residential and commercial uses with an occasional vacant lot scattered throughout the project. The southern portion of the City includes Ream Field, the TRNERR, the Tijuana Slough National Wildlife Refuge, and Border Field State Park. Although archaeological investigation of the South Bay region began in the 1920's, field work within the project area has largely been limited to research associated with the preparation of environmental impact reports. As with much of the Coastal Zone, historic development of the South Bay region has seriously degraded the quantity and quality of the archaeological site located therein.

There are relatively few prehistoric sites recorded in the Imperial Beach area. This relatively low density of sites is probably due more to a lack of research than an actual low intensity of prehistoric utilization of the region. The prehistoric sites identified by the record search range in age from San Dieguito to the Late Prehistoric. Although La Jollan sites appear to be the most frequent in the area.

Nine sites have been identified within the City limits of Imperial Beach. Three of these are north of Highway 75, while the remainders of the sites are in the Ream Field/Estuary/Border Field State Park region. While the number of sites is relatively small, taken together with the archaeological record for the whole South Bay region, they indicate more or less continuous intensive use of the area from circa B.C. 10,000 into the historic era.

CEQA Guidelines Section 15064.5 defines historic resources as any object, building, structure, site, area, place, record, manuscript or other resource listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historic resources, or the lead agency. Generally, a resource is considered to be "historically significant" if it meets one of the following criteria:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Is associated with the lives of important persons in the past;
- Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history.

The Housing Element Update requires the development of an additional 87 housing units in the City. However, the Housing Element Update contains policies and programs rather than ordinance amendments or specific projects. Without specific data on the location and type of new residential development, it is not possible to determine potential impacts to archaeological and historic resources. Environmental review of new residential development(s) would permit an analysis of how such development may potentially conflict with known archaeological and/or historic resources. The possibility also exists that future development would discover or uncover previously unknown archaeological resources. Therefore, a case-by-case environmental review of future housing projects and programs would be necessary to ensure consistency with State, Federal, and all General Plan goals, objectives, and policies. Adherence to applicable City, County, State, and Federal standards and guidelines related to the protection/preservation of cultural resources, as well as the requirements mandated during the environmental review of individual projects would reduce potential impacts related to cultural resources to a ***less-than-significant*** level.

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<b>VI. GEOLOGY AND SOILS.</b>				
<i>Would the project:</i>				
a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:			
i.	<input type="checkbox"/>		<b>×</b>	
	Rupture of a known earthquake fault, as delineated on the most recent Alquist - Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area based on other substantial evidence of a known fault?			
ii.	<input type="checkbox"/>	<input type="checkbox"/>	<b>×</b>	<input type="checkbox"/>
	Strong seismic ground shaking?			
iii.	<input type="checkbox"/>	<input type="checkbox"/>	<b>×</b>	<input type="checkbox"/>
	Seismic-related ground failure, including liquefaction?			
iv.	<input type="checkbox"/>	<input type="checkbox"/>	<b>×</b>	<input type="checkbox"/>
	Landslides?			
b.	<input type="checkbox"/>	<input type="checkbox"/>	<b>×</b>	<input type="checkbox"/>
	Result in substantial soil erosion or the loss of topsoil?			
c.	<input type="checkbox"/>	<input type="checkbox"/>	<b>×</b>	<input type="checkbox"/>
	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			
d.	<input type="checkbox"/>	<input type="checkbox"/>	<b>×</b>	<input type="checkbox"/>
	Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code?			
e.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>×</b>
	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?			

### Discussion

- a-i,ii. The most current listing of cities and counties affected by the Alquist-Priolo Act does not include the City of Imperial Beach. Available data indicate that three major regional zones of faulting within the San Diego Region: (1) The San Jacinto fault zone, located in the eastern part of the county, is considered to a major active branch of the San Andreas fault system, the maximum probable earthquake from this fault is between 7.5 and 7.8 on the Richter scale; (2) The Elsinore fault zone paralleling the San Jacinto fault zone is the largest known active fault in the county of San Diego. The fault is approximately 135 miles long. The area of most probable activity is between Lake Elsinore and Vallecito Valley, a distance of about 60 miles. The maximum probable earthquake magnitude from this fault is 7.6; and (3) The Rose Canyon fault zone, paralleling the Pacific coastline, is considered to be the possible southeasterly extension of the Newport-

Inglewood fault zone, which was the source of the 1933 Long Beach earthquake. The Sweetwater and LaNacion Faults are located four to six miles inland from and parallel to the Rose Canyon fault and San Diego Bay. (Imperial Beach General Plan, Section S, pS-8)

Ground shaking is the oscillation or vibration of earth materials resulting from an earthquake. Ground shaking is the most commonly experienced earthquake phenomenon because tremors may be felt tens or hundreds of mile from the earthquake epicenter.

Assuming no known faults lie within Imperial Beach, and the nearest fault is the LaNacion, located two miles east of the City, predictions are reasonable that any damage from future earthquakes would be due to local ground shaking originating from a more distant source. Ground shaking hazards are most likely to occur in areas of Imperial Beach underlain by loose, water-saturated, unconsolidated materials commonly referred to as deposits. The severity and type of ground shaking depends on several factors including: (1) earthquake magnitude and duration; (2) distance from the earthquake's epicenter; (3) local subsurface conditions; and (4) type of construction material used.

Amending the City of Imperial Beach General Plan to include the Housing Element Update would not result in any significant geological impacts because actions to implement the goals, policies, and actions included in the Housing Element must be consistent with the goals, policies and standards established within the other elements of the General Plan that are intended to protect the safety of the community. Furthermore, all new housing development and rehabilitation that might result from Housing Element implementation would be required to be consistent with existing State and local building codes which are designed to ensure that new construction does not expose people to significant geological impacts. Therefore, the project would result in ***less-than-significant*** impacts associated with seismic hazards.

a-iii,iv,c. Liquefaction is a process by which water-saturated materials (including soil, sediment, and certain types of volcanic deposits) lose strength and may fail during strong ground shaking. Liquefaction is defined as "the transformation of a granular material from a solid state into a liquefied state as a consequence of increased pore-water pressure. Liquefaction potential depends upon many factors such as soil type, relative density and the intensity and duration of ground shaking should be emphasized. Due to the structure of the soils and the high water table within the City limits, liquefaction poses the biggest threat of serious damage in the event of moderate or major seismic activity.

Landslides can occur with or without an earthquake. These slope failures can be attributed to the type of material, structural properties of that material, steepness of the slope, water, vegetation type, and proximity to areas of active erosion. Since the terrain of Imperial Beach is generally flat, landslides cannot be considered a significant hazard. However, small cliffs within Border Field State Park and at the south of Seacoast Drive, so exist. Limited landslides may occur in these areas during an earthquake of sufficient magnitude.

The update to the City's Housing Element identifies that an additional 87 housing units are required in the City. In the absence of specific information regarding the location and type of these additional units, to determine if new residential development would be

subject to liquefaction, landslide, and other related hazards would not be possible. New residential development within the City would be designed and constructed to meet the most current seismic safety standards for liquefaction included in the Uniform Building Code (UBC) and/or standards established by the City of Imperial Beach. Therefore, a case-by-case review of future housing projects and programs would be necessary to ensure consistency with State, Federal, and all General Plan goals, objectives, and policies. Adherence to these requirements would reduce potential liquefaction, landslide, and other related impacts to a ***less-than-significant*** level.

- b. Development of the 87 residential units identified in the Regional Housing Needs Assessment would require earth-moving activities, which would expose soils, thereby increasing the potential for erosion or loss of top-soil. The susceptibility of soils to erosion varies depending on the location, base material, topography, surrounding environment (e.g., natural cover or paved surfaces), and the level of ground disturbance activities. In the absence of information as to where new residential development would occur, it is not possible to ascertain if (or to what level), the development of specific residential projects would contribute to the erosion of or loss of topsoil. Therefore, a case-by-case environmental review of future housing projects and programs would be necessary to ensure consistency with State, Federal, and all General Plan goals, objectives, and policies.

Compliance with National Pollution Discharge Elimination System (NPDES) permit and Storm Water Pollution Prevention Plan (SWPPP) requirements as well as implementation of best management practices would reduce impacts related to soil erosion to a ***less-than-significant*** level.

- d. Expansive soils have the potential for shrinking and swelling with changes in moisture content, which can cause damage to overlying structures. The amount and type of clay in the soil influences the changes. Expansive soils are a common feature and problem throughout Southern California. Not only do direct damage costs amount to many millions of dollars each year (for Southern California), but the damage is usually reflected in lower property values and resulting tax revenues. The problems resulting from expansive soils can be controlled by proper engineering and construction practices. The presence or absence of expansive soils is therefore not considered a critical factor in overall land planning.

The update to the City's Housing Element identifies that an additional 87 housing units are required in the City. In the absence of specific information regarding the location and type of these additional residential units, to determine if new residential development is subject to hazards associated with expansive soil(s) would not be possible. New residential development within the City would be designed and constructed to meet the most current standards included in the Uniform Building Code. Implementation of the related City of Imperial Beach General Plan policies and environmental review would mitigate any potential impacts to a less-than-significant level. Therefore, adherence to the above requirements would reduce potential expansive soils impacts to a ***less-than-significant*** level.

- e. The Housing Element Update contains policies and programs rather than specific projects. In addition, future residential development within the City would utilize local sewer systems. Adherence to applicable City standards related to the placement,

construction, and suitability of sewage disposal system would reduce potential impacts related to this issue to a **no impact** level.

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<b>VII. HAZARDS AND HAZARDOUS MATERIALS.</b>				
<i>Would the project:</i>				
a.	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
b.	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?				
c.	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
d.	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e.	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				
f.	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				
g.	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
h.	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
Expose people or structures to the risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				

## Discussion

- a,b. The potential release of hazardous materials along roadways is an on-going condition that is regulated by Federal, State, and local regulations. This condition would exist with or without the proposed project.

The update to the City's Housing Element identifies that an additional 87 housing units are required in the City. Because the Housing Element is a policy level document, the Housing Element does not include any site specific designs or proposals that would enable an assessment of potential site specific hazardous impacts that may result from future housing development proposals. However, operation of residential developments generally does not involve hazardous materials, aside from common household products.

Amending the City of Imperial Beach General Plan to include the Housing Element Update would not result in any significant hazards, such as exposure to potential health hazards, or creation of a health hazard, because actions to implement the goals, policies, and actions included in the Housing Element must be consistent with the goals, policies, and standards established within the other elements of the General Plan that are intended to protect the safety of the community. Furthermore, to ensure that development of housing on specific sites does not result in potentially significant hazards or expose people to potential health hazards, future projects would be reviewed for consistency with State, Federal, and local requirements and guidelines. Adherence to such requirements would reduce potential impacts associated with this issue to a ***less-than-significant*** level.

- c. Residential units constructed through implementation of the Housing Element Update may be located within one-quarter mile of an existing or planned school. The Housing Element Update contains policies and programs rather than specific projects. In the absence of specific information regarding the location and type of these additional residential units, to determine potential impacts to existing or planned schools would not be possible. An analysis of potential impacts associated with the Housing Element Update to existing or planned schools would be conducted during the environmental review of specific residential developments. Adherence to applicable City, State, and/or Federal regulations related to the transport, use, storage or disposal of hazardous materials would reduce the potential impacts related to this issue to a ***less-than-significant*** level.
- d. The Housing Element Update contains policies and programs rather than specific projects. In the absence of specific information regarding the location and type of additional residential units, a residential development site cannot be identified as being located in or near an area identified as a hazardous materials site. Review of potential impacts related to this issue would be conducted during the environmental review of specific residential developments. Adherence to applicable City, State, and/or Federal regulations would reduce potential hazards to the public to a ***less-than-significant*** level.
- e,f. A military airport is located within the City of Imperial Beach. The nearest Public or Private general aviation\_use airport is Brown Field 8 miles away at Otay Mesa, the San Diego International Airport, a commercial\_aviation airport, is 11.5 miles from the City of Imperial Beach. San Diego International Airport offers commercial and passenger travel.

The Housing Element Update contains policies and programs rather than specific projects. Future development proposals would undergo analysis to determine whether a residential development site would be located within an Airport Land Use Plan (ALUP) or if such development would create a safety hazard for persons residing in new residential development. Review of potential impacts related to this issue would be conducted during the environmental review of specific residential developments. Adherence to applicable City, State, and/or Federal regulations would reduce potential hazards associated with this issue to a **less-than-significant** level.

- g. The Housing Element Update contains policies and programs rather than specific projects. In the absence of specific information regarding the location and type of additional residential units, the impact of new residential development on the emergency response and/or emergency evacuation plans adopted by the City cannot be determined. Development of residential uses would be consistent with applicable requirements of adopted emergency response/evacuation plans; thus, reducing potential impacts related to this issue to a **less-than-significant** level.
- h. The Housing Element Update is a policy level document and therefore does not contain specific projects. However, upon the construction of housing anticipated in the Housing Element Update, new housing would typically occur on undeveloped or underutilized land, some of which may be located adjacent to areas with a significant risk for property damage or injury resulting from wildland fires. The transition from natural vegetation to urban uses would increase the potential for wildland fire impacts. New residential development would be evaluated to determine the exposure of people and structures to a significant risk of loss due to wildland fires. New development would adhere to applicable and appropriate standards and regulations of responsible fire authorities, thereby reducing potential wildland fire impacts to a **less-than-significant** level.

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<b>VIII. HYDROLOGY AND WATER QUALITY.</b>				
<i>Would the project:</i>				
a. Violate any water quality standards or waste discharge requirements?			✘	
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				✘
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			✘	

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			✘	
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			✘	
f. Otherwise substantially degrade water quality?			✘	
g. Place housing within a 100-year floodplain, as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				✘
h. Place within a 100-year floodplain structures which would impede or redirect flood flows?				✘
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.			✘	
j. Expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow?			✘	
k. Result in increased impervious surfaces and associated increase runoff?			✘	
l. Tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?			✘	
m. Result in discharges into surface waters during or following construction, or in significant alternation of surface water quality including, but not limited to temperature, dissolved oxygen, turbidity or typical storm water pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash)?			✘	
n. Cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?			✘	
o. Have a potentially significant environmental impact on surface water quality, to either marine, fresh, or wetland waters? Can the project impact aquatic, wetland, or riparian habitat?			✘	

## Discussion

a,f., k-o Under Section 402 of the Clean Water Act, the Regional Water Quality Control Board (RWQCB) issues NPDES permits to regulate waste dischargers to “waters of the nation.” Waters of the nation include rivers, lakes, and their tributary waters. Waste discharges include discharges of stormwater and construction project discharges. A construction project resulting in the disturbance of one (1) or more acres requires a NPDES ground construction permit. Construction project proponents are required to prepare a Stormwater Pollution Prevention Plan (SWPPP). All projects are subject to the City’s Jurisdictional Urban Runoff Management Plan. (JURMP).

The Housing Element Update is a policy level document and therefore does not contain specific projects. Future development anticipated in the Housing Element Update would be subject to the City’s environmental review process; therefore, future residential development would be evaluated on an individual basis for potential violation of water quality standards or waste discharge requirements. Implementation of Best Management Practices (BMPs) as specified by the NPDES permit and the approval of a SWPPP would ensure that any potential impacts associated with this issue would be reduced to a **less-than-significant** level.

b. The Housing Element Update is a policy level document and therefore does not contain specific projects. The Housing Element Update indicates that sufficient water exists to accommodate the Regional Housing Needs Allocation. Therefore, the impacts associated with the Housing Element would be **less-than-significant** and mitigation measures are not required.

c-e. Because the Housing Element is a policy level document, the Housing Element does not include any site specific designs or proposals that would enable an assessment of potential site specific stormwater runoff and drainage pattern impacts that may result with future housing development proposals. A case-by-case environmental review of future housing projects would be carried out to ensure the safety of the future communities, and that future projects are consistent with all General Plan goals, objectives, and policies. Adherence to such requirements would reduce potential impacts associated with this issue to a **less-than-significant** level.

g-i. The Tijuana River Valley is subject to floods of great magnitude since the valley is the drainage way for the largest of the watershed basins in San Diego County. This drainage basin covers 1,700 square miles, only 27 percent of which lies within the United States. The river crosses the border at a point five miles inland from the Pacific Ocean and flows through the Tijuana River Valley. At the point where the river approaches the Imperial Beach City limits, the waterway turns into an estuary.

Most of the identified 100-year floodplain encompasses the estuary. This area has been designated as open space, due in part to the estuary’s location in a floodplain, and in part to the natural habitat of the area. Because the Housing Element is a policy level document, the Housing Element does not include any site specific designs or proposals that would enable an assessment of potential site specific flooding impacts that may result with future housing development proposals. Therefore, a case-by-case design review of future housing projects would be carried out to ensure the safety of the future communities, and that future projects are consistent with all General Plan goals,

objectives, and policies. Adherence to such requirements would reduce potential impacts associated with this issue to a **less-than-significant** level.

- j. A tsunami is a sea wave generated by a submarine earthquake, landslide or volcanic action. While the possibility of a major tsunami from either of the latter two events is considered to be extremely remote for Imperial Beach, a tsunami caused by a submarine earthquake is considered possible. Submarine earthquakes are common around the edges of the Pacific Ocean, as well as other areas. Therefore, all of the Pacific Coastal areas are subject to this potential hazard to a greater or lesser degree.

Even though most of Imperial Beach lies within the category of low-lying shoreline, to predict the likelihood or magnitude of a major tsunami would not be possible. Most experts agree that although possible, it is highly improbable that a damaging tsunami, either locally or distantly generated, would occur on the Southern California coast.

Because the Housing Element is a policy level document, the Housing Element does not include any site specific designs or proposals that would enable an assessment of potential site specific impacts resulting from seiches and mudslides that may result with future housing development proposals. Therefore, a case-by-case design review of future housing projects would be carried out to ensure the safety of the future communities, and that future projects are consistent with all General Plan goals, objectives, and policies. Adherence to such requirements would reduce potential impacts associated with this issue to a **less-than-significant** level.

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<b>IX. LAND USE AND PLANNING.</b>				
<i>Would the project:</i>				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>	<input type="checkbox"/>
b. Conflict with any applicable land use plans, policies, or regulations of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating on environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural communities conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>	<input type="checkbox"/>

**Discussion**

- a. Development anticipated by the Housing Element Update would involve development of vacant land and underutilized land. The proposed project would involve a change in land use from vacant land to residential urban uses, but would not significantly divide any community or reduce access to community amenities. Therefore, project impacts are considered **less-than-significant** and mitigation measures are not required.

- b. The City of Imperial Beach’s current Housing Element was adopted in 1999. At the time of adoption, all Element’s of the City’s General Plan were consistent. In accordance with State Law, the City of Imperial Beach has prepared a new 2005-2010 Housing Element, which is the document evaluated in this Initial Study. With the adoption of this new Housing Element, all elements of Imperial Beach’s General Plan will be consistent with one another. Therefore, upon adoption, the proposed project would have **less-than-significant** impacts to land use plans and policies.
- c. Imperial Beach is unique in that the City contains an estuary as well as approximately three and a half miles of coastline. The interrelationship between the Tijuana River and the ocean is very crucial. Interference with natural processes in the past has resulted in the alteration of that interrelationship which has caused severe beach erosion. Because the Housing Element is a policy level document, the Housing Element does not include any site specific designs or proposals that would enable an assessment of potential site specific impacts related to mineral resources that may result with future housing development proposals. Therefore, a case-by-case design review of future housing projects would be carried out to ensure that future projects are consistent with all General Plan goals, objectives, and policies. Adherence to such requirements would reduce potential impacts associated with this issue to a **less-than-significant** level.

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<b>X. MINERAL RESOURCES.</b>				
<i>Would the project:</i>				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>

**Discussion**

- a,b. According to the San Diego County General Plan the coastal or western portion of the County is covered with essentially Tertiary Age flat-lying consolidated sedimentary rocks. Sandstone, conglomerate and mudstone are the principle rock types. However, none of the sites of significant value are located with the Imperial Beach City Limits (San Diego County General Plan, p X-55-57). Because the Housing Element is a policy level document, the Housing Element does not include any site specific designs or proposals that would enable an assessment of potential site specific impacts related to mineral resources that may result with future housing development proposals. However, because these mineral resources do not occur in the City of Imperial Beach, **no impact** to mineral resources would occur as a result of the implementation of the policy document.

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<b>XI. NOISE.</b>				
<i>Would the project result in:</i>				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>

### **Discussion**

- a. Sound refers to anything that is or may be perceived by the ear. Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, and sleep. Noise impacts can be described in three categories. The first is audible impacts that refer to increases in noise levels noticeable to humans. Audible increases in noise levels generally refer to a change of 3.0 decibels (dB) or greater because this level has been found to be barely perceptible in exterior environments. The second category, potentially audible, refers to a change in the noise level between 1.0 and 3.0 dB. This range of noise levels has been found to be noticeable only in laboratory environments. The last category is changes in noise level of less than 1.0 dB that are inaudible to the human ear. Only audible changes in existing ambient or background noise levels are considered potentially significant.

The proposed project identifies a housing need of 87 housing units in the City. Typically, residential housing does not generate unacceptable noise levels, which would exceed

City standards. However, adopting and implementation of the Housing Element may be expected to result in the exposure of persons to noise levels in excess of standards established in the General Plan or Noise Ordinance. Without identifying the location of residential development, to determine if future housing would be placed near land uses that would generate noise levels that would exceed acceptable standards would not be possible. Therefore, a case-by-case environmental review of future housing projects would be carried out to ensure that future residents are not exposed to unacceptable noise levels, and that the projects are consistent with all General Plan goals, objectives, and policies, and the City's Noise Ordinance. Adherence to such requirements would reduce potential impacts associated with this issue to a **less-than-significant** level.

- b. The construction of new residential uses would require the use of earthmoving vehicles and construction equipment. The operation of this equipment would temporarily increase the potential for groundborne vibration and/or noise. Potential groundborne noise/vibration impacts resulting from construction of additional residential units envisioned by the Housing Element Update would be short-term. As part of the environmental review of future residential development, short term noise and vibration would be evaluated. Construction activities associated with new residential development would be required to comply with applicable City standards regarding the generation of ground vibration or groundborne noise. Adherence to these standards would reduce impacts associated with construction noise and vibration to a **less-than-significant** level.
- c. The update to the Housing Element identifies that an additional 87 housing units are required in the City. The development of new residential uses typically increases the traffic volumes in the vicinity of new development. Because traffic noise is a primary contributor to the local noise environment, any increase in traffic resulting from the development of new residential uses would be expected to proportionally increase local noise levels.

An analysis of potential impacts associated with permanent increases in ambient noise levels brought about through implementation of the Housing Element Update would be conducted as part of the environmental review required for individual residential developments. In addition, adherence to applicable City and/or State noise standards would reduce potential impacts related to this issue to a **less-than-significant** level.

- d. The update to the Housing Element identifies that an additional 87 housing units are required in the City. Development of new residential uses would require the modification of individual project sites, installation of utilities, and construction of structures. Noise generated from grading and construction equipment, as well as noise generated from workers' vehicles would contribute to a temporary increase in ambient noise levels in the vicinity of the project site.

An analysis of potential impacts associated with temporary increases in ambient noise levels brought about through implementation of the Housing Element Update would be conducted as part of the environmental review of individual residential developments. Adherence to applicable City and/or State noise standards would reduce potential impacts related to short term construction noise to a **less-than-significant** level.

- e,f. The noise contours for Ream Field were developed in 1988 by the Western Division of the Naval Facilities Command. The validity of this data was evaluated in a study

commissioned by the City of Imperial Beach in 1992. The study showed land uses that are located within the 65 dB and higher contours. Ream Field noise principally affects portions of the Seaview, Seaside Point and Oneonta neighborhoods. Implementation of the proposed Housing Element Update would not change Ream Field noise patterns. Future noise conflicts would require additional coordination with the Navy to encourage air traffic patterns and times of operation that minimize such impacts. That Ream Field could be closed completely and all noise impacts from the facility would thus be eliminated, would also be possible.

In addition, future residential development anticipated by the Housing Element Update would be individually evaluated to identify how such development would be potentially impacted by airport related noise. Compliance with applicable City, State, and/or Federal noise standards would reduce potential impacts related to this issue to a **less-than-significant** level.

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<b>XII. POPULATION AND HOUSING.</b>				
<i>Would the project:</i>				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>

**Discussion**

- a-b. The addition of the housing units proposed in the Housing Element Update would help to increase the number of housing units in the City and improve the jobs/housing balance. All of the housing proposed by the Housing Element Update is within the existing City limits and on land that is already served by the necessary infrastructure for residential development, or on land that can have the necessary infrastructure systems extended. For these reasons, adoption and implementation of the Housing Element would not be expected to induce substantial growth that would require significant new infrastructure, displace substantial numbers of existing housing, or necessitate the construction of replacement housing. Therefore, approval and implementation of the Housing Element Update would have **less-than-significant** impacts to population and housing.
- c. The Housing Element Update contains policies and programs rather than specific projects. Future development anticipated by the Housing Element Update would be constructed on vacant and underutilized land in the City, and existing housing would not

be displaced. Therefore, the Housing Element would have **less-than-significant** impacts related to the displacement of existing housing.

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<b>XIII. PUBLIC SERVICES.</b>				
<i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</i>				
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>

**Discussion**

- a. Residential development proposed by the Housing Element Update would be served by the Imperial Beach Fire Department. The additional development of 87 housing units set forth by the Housing Element would increase the need for fire protection services in the City. However, the Housing Element Update contains goals, policies, and programs rather than specific projects. Future development may require improvements to existing facilities or increases in staffing and equipment. Through the City’s environmental review process, future development would be evaluated on an individual basis for potential impacts related to the provision of fire protection services. Without specific details regarding each development, the adequacy of fire protection is impossible to determine with any precision. These needs would be evaluated in the environmental review for each individual project. Where needed, appropriate mitigation measures would be required to reduce potential impacts to a level that is less-than-significant. Therefore, the Housing Element Update would result in **less-than-significant** impacts to fire protection.
  
- b. Residential Development proposed in the Housing Element Update will be served by the San Diego County Sheriff’s Department. The additional development of 87 housing units set forth by the Housing Element would increase the need for police protection services in the City. However, the Housing Element Update contains goals, policies, and programs rather than specific projects. Future development anticipated in the Housing Element Update may require improvements to existing facilities or increases in staffing and equipment. Through the City’s environmental review process, future development would be evaluated on an individual basis for potential impacts related to the provision of police protection services. Without specific details regarding each development, the adequacy of police protection is impossible to determine with any precision. These needs would be addressed and met as each development is

constructed. Where needed, appropriate mitigation measures would be required to reduce potential impacts to a level that is less-than-significant. Therefore, the Housing Element Update would result in **less-than-significant impacts** to police protection.

- c. Public school education in Imperial Beach is provided by the South Bay Union School District for preschool and kindergarten through sixth grade, while the Sweetwater Union High School District serves seventh through twelfth grade. Currently, eight public schools are located in the City limits. The Housing Element Update identifies an assigned growth need of 87 additional housing units for development through 2010. Development of additional housing provided to meet anticipated population growth, thereby increasing the demand on schools. Additional facilities and staffing may be necessary to accommodate the growth. Payment of the School Facilities Mitigation Fee has been deemed by the State legislature to be full and complete mitigation of the impacts of a development project on the provision of adequate school facilities. The environmental assessment of each individual project would require, at minimum, the standard School Facilities Mitigation Fee, which ensures that the Housing Element Update would not result in a significant impact under CEQA, in accordance with Senate Bill 50, which became effective in 1998. Therefore, the impact from the Housing Element Update would be **less-than-significant**.
- d. The City of Imperial Beach owns and maintains approximately 14.74 acres of park land in four sites consisting of Sports Park, Ream Park, Triangle Park and Marina Vista Park. The Housing Element Update identifies an assigned growth need of 87 additional housing units for development through 2010. The Housing Element Update contains goals, policies, and programs rather than specific projects. Future development anticipated in the Housing Element Update would increase the demand for additional parkland in the City. All future residential development would be reviewed to ensure consistency with the Imperial Beach General Plan and all applicable City ordinances. Adherence to these measures would reduce impacts associated with this issue to a **less-than-significant** level.

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<b>XIV. RECREATION.</b>				
<i>Would the project:</i>				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>	<input type="checkbox"/>

**Discussion**

a,b. As of 1994, the City had approximately 14.74 acres of park land. Development in accordance with the General Plan, while providing opportunities for parkland acquisition and development, would place demands on existing facilities and programs and create additional demands for new facilities and programs. The Housing Element Update identifies an assigned growth need of 87 additional housing units for development through 2010. The Housing Element Update contains goals, policies, and programs rather than specific projects. Future development anticipated in the Housing Element Update would increase the demand for additional parkland in the City. Future residential development are assessed a residential construction fee to fund additional capacity for park development. All future residential development shall be reviewed to ensure consistency with the Imperial Beach General Plan and all applicable City ordinances. Adherence to these measures would reduce impacts associated with this issue to a **less-than-significant** level.

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<b>XV. TRANSPORTATION AND CIRCULATION.</b>				
<i>Would the project:</i>				
a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>	<input type="checkbox"/>
b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>
d. Substantially increase hazards due to a design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>	<input type="checkbox"/>
f. Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>	<input type="checkbox"/>
g. Conflicts with adopted policies supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<b>✘</b>	<input type="checkbox"/>

**Discussion**

a,b. The Housing Element Update identifies an assigned growth need of 87 additional housing units. Because the Housing Element is a policy level document, the Element does not include site specific designs or proposals that would enable an assessment of potential site specific transportation impacts that may result with future housing

development proposals. All future residential development shall be reviewed to ensure consistency with all regional and local transportation plans and policies, the Imperial Beach General Plan, and all applicable City ordinances. In addition, all proposals, both private and public, to develop new residential units shall be subject to a project-specific environmental analysis. Adherence to such requirements would reduce potential impacts associated with this issue to a **less-than-significant** level.

- c. Development anticipated by the Housing Element Update involves the potential development of 87 housing units on vacant and underutilized parcels of land throughout the City. The anticipated amount of development would not result in any changes to air traffic patterns nor would the anticipated amount of development result in any substantial safety risks related to aircraft traffic. Therefore, the proposed project would have **no impact**.
- d. The Housing Element Update identifies an assigned growth need of 87 additional housing units through 2010. Any needed traffic improvements associated with the anticipated development would be constructed to the City's roadway safety standards. The increased amount of traffic associated with the anticipated development would not substantially increase hazards to motorists, pedestrians, or bicyclists. Through the City's environmental review process, future development projects would be evaluated for potential safety impacts. Where needed, appropriate mitigation measures would be required to reduce potential impacts to a less-than-significant level. Therefore, the Housing Element Update would result in a **less-than-significant** impact.
- e. The Housing Element Update identifies an assigned growth need of 87 additional housing units through 2010. Any future residential projects would be required to conform to traffic and safety regulations that specify adequate emergency access measures. Without specific details regarding each development, the adequacy of emergency access is impossible to determine with any precision. Future development projects would be evaluated to determine adequacy of emergency access prior to approval. Therefore, the proposed project would have a **less-than-significant** impact to hazards resulting from design features.
- f. Development anticipated by the Housing Element Update involves the construction of residential dwelling units. Each development would be required to adhere to all applicable City of Imperial Beach standards pertaining to the provision of parking facilities. Future development projects would be evaluated to determine adequacy of parking on an individual basis. Adherence to these standards would reduce potential parking impacts to a **less-than-significant** level.
- g. The City of Imperial Beach contains access to several forms of alternative transportation such as bus services, bike pathways, and sidewalks. The Housing Element Update identifies an assigned growth need of 87 housing units by 2010. Because the Housing Element is a policy level document, the Housing Element does not include site specific designs or proposals that would enable an assessment of potential site specific impacts to alternative transportation that may result with future housing development proposals. Future development proposals would provide for alternative modes of transportation. Therefore, the proposed project would have a **less-than-significant** impact.

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<b>XVI. UTILITIES AND SERVICE SYSTEMS.</b>				
<i>Would the project:</i>				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Comply with Federal, State, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion**

a,b,d,e. The City of Imperial Beach is a member of the San Diego Metropolitan Sewerage System (Metro). The City operates its own sewage collection system which consists of 11 pump stations, 16,200 feet of force main, and approximately 36 miles of sewer lines. The City of Imperial Beach is anticipated to expand the collection and treatment facilities to meet future need. A private company, California American Water Company, provides domestic water. Currently, existing infrastructure is available to the all of the residential sites identified in the vacant land survey. In 1990, the City adopted a Water and Sewer System Master Plans. This Plan indicates that there is sufficient infrastructure to accommodate the anticipated build out during the 1994-2014 planning period.

Construction anticipated by the Housing Element Update includes an assigned growth need of 87 housing units for development through 2010. Amending the City of Imperial

Beach General Plan to include the Housing Element Update would not result in any impacts to water and wastewater service because actions to implement the goals, policies, and programs included in the Housing Element must be consistent with the goals, policies, and standards established within the other elements of the General Plan. However, the City would need to continue to carefully review individual projects and work with utility providers to ensure that future projects do not result in localized or project specific utility impacts and ensure that each project is contributing a fair share financial contribution to the ongoing improvement of the public systems. Water and wastewater improvements are required as part of a building permit for most types of “new development.” Therefore, the Housing Element Update would have **less-than-significant** impacts to water and wastewater.

c. Because the Housing Element is a policy level document, the Housing Element does not include any site specific designs or proposals that would enable an assessment of potential site specific stormwater runoff impacts that may result with future housing development proposals. Therefore, a case-by-case environmental review of future housing projects would be carried out to ensure the safety of future communities, and that future projects are consistent with all General Plan goals, objectives, and policies. Adherence to such requirements would reduce potential impacts associated with this issue to a **less-than-significant** level.

f,g. Solid waste collection is a “demand-responsive” service and current service levels can be expanded and funded through user fees without difficulty. Future development would also coordinate with a certified waste hauler to develop curbside collection of recyclable materials within the City. All future development within the City shall comply with applicable elements of the California Solid Waste Reuse and Recycling Access Act of 1991. Future waste disposal needs cannot be accurately determined without site locations and specific project details. The volume of solid waste generated by the anticipated housing units set forth by the Housing Element Update is not anticipated to adversely impact landfills or other solid waste disposal facilities. Where needed, appropriate mitigation measures would be required to reduce potential impacts to a level that is less-than-significant. Therefore, the Housing Element Update would result in **less-than-significant** impacts to solid waste.

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Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than- Significant Impact	No Impact
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**XII. MANDATORY FINDINGS OF SIGNIFICANCE.**

<p>a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
b. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
c. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
d. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>

### Discussion

- a,b. Although the Housing Element Update identifies an assigned growth need of 87 additional housing units within the City, the Housing Element Update is a policy level document designed to guide the City in future planning through 2010. The number of units proposed for construction by the Housing Element can be accommodated within the Imperial Beach City Limits and under the current General Plan designations. The information provided in this initial study demonstrates that the implementation of the City of Imperial Beach's standard policies and codes, along with adhering to environmental review procedures where applicable, would reduce potential impacts to a level that is ***less-than-significant***.
- c,d. The General Plan buildout involves the implementation of the Housing Element Update for the City of Imperial Beach. The Housing Element Update contains policies and programs rather than ordinance amendments or specific projects. However, the Housing Element Update identifies an assigned growth need of 87 additional housing units within the City. Development would increase the amount of traffic on local roadways, emission of pollutants and particulate matter, generate noise within the project limits, and impact the provision of public services. Without the exact number of units to be constructed or specific details regarding each project, the effects on the environment, either directly or indirectly, is impossible to determine with any precision. Through the City's environmental review process, future development projects would be evaluated individually for potential direct and indirect impacts. Where needed appropriate mitigation measures would be required to reduce potential impacts to a level that is less-than-significant. Therefore, the impact would be considered ***less-than-significant***.