

RESOLUTION NO. 2019-8052

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF IMPERIAL BEACH, CALIFORNIA, ADOPTING A NEGATIVE DECLARATION (ND) AND INITIAL STUDY (IS)/ENVIRONMENTAL CHECKLIST FOR THE RESILIENT IMPERIAL BEACH (RIB) PROJECT (MF 1234)

WHEREAS, on June 19, 2019, the City Council of the City of Imperial Beach held a duly advertised public hearing for the purpose of considering the adoption of a Negative Declaration (ND) and Initial Study (IS)/Environmental Checklist for the Resilient Imperial Beach Draft General Plan/Local Coastal Program (LCP) Amendment and Climate Action Plan (CAP) (MF1234); and

WHEREAS, the City Council finds that the Negative Declaration (ND) and Initial Study (IS)/Environmental Checklist for the Resilient Imperial Beach (RIB) Draft General Plan/Local Coastal Program (LCP) Amendment and Climate Action Plan (CAP) complies with the California Environmental Quality Act (CEQA) requirements; and

WHEREAS, the City submitted the Negative Declaration (ND) and Initial Study (IS)/Environmental Checklist for the RIB Draft General Plan/Local Coastal Program (LCP) Amendment and Climate Action Plan (CAP) to the California State Clearinghouse Office of Planning and Research (SCH # 2019030143) on March 25, 2019 consistent with CEQA guidelines § 15073; and

WHEREAS, the City held a public comment period for the Negative Declaration (ND) and Initial Study (IS)/Environmental Checklist for the RIB Draft General Plan/Local Coastal Program (LCP) Amendment and Climate Action Plan (CAP) project from March 25, 2019 to May 15, 2019 and advertised in the IB Eagle and Times for availability during the public review period consistent with CEQA's 30-day public review period; and

WHEREAS, the City addressed and responded to all public comments on the Negative Declaration (ND) and Initial Study (IS)/Environmental Checklist for the RIB Draft General Plan/Local Coastal Program (LCP) Amendment and Climate Action Plan (CAP) project received during the public review period consistent with CEQA and included them in the Final ND; and

WHEREAS, 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; 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; and

WHEREAS, the City Council of the City of Imperial Beach has considered the record as well as the maps, exhibits, and written documents contained in the file for the Negative Declaration and Initial Study/ Environmental Checklist on record in the City of Imperial Beach, and has considered the oral presentations given at the public hearing.

NOW, THEREFORE, BE IT RESOLVED, that the Negative Declaration and Initial Study/ Environmental Checklist, as shown and made a part of Resolution No. 2019-8052 in attached Exhibit A is hereby approved by the City Council of the City of Imperial Beach.

PROTEST PROVISION: The 90-day period in which any party may file a protest, pursuant to Government Code Section 66020, of the fees, dedications or exactions imposed on this development project begins on the date of the final decision.

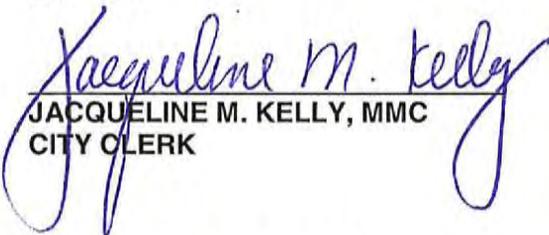
PASSED, APPROVED, AND ADOPTED by the City Council of the City of Imperial Beach at its meeting held on the 17th day of July 2019, by the following vote:

AYES: COUNCILMEMBERS: WEST, SPRIGGS, AGUIRRE, PATTON, DEDINA
NOES: COUNCILMEMBERS: NONE
ABSENT: COUNCILMEMBERS: NONE



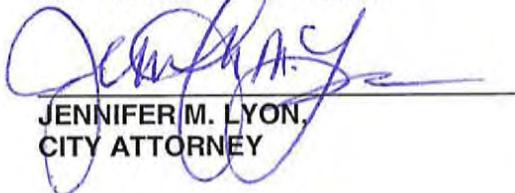
SERGE DEDINA, MAYOR

ATTEST:



JACQUELINE M. KELLY, MMC
CITY CLERK

APPROVED AS TO FORM:



JENNIFER M. LYON,
CITY ATTORNEY

APPROVED

**Final Negative Declaration
for the
General Plan/Local Coastal Program (LCP) Update and
Climate Action Plan (CAP) for the
2019 Resilient Imperial Beach (RIB) Project
MF 1234**

Imperial Beach, California

Prepared for:

Jim Nakagawa, AICP
City Planner
Community Development Department
City of Imperial Beach
825 Imperial Beach Boulevard
Imperial Beach, CA 91932

Prepared by:

AECOM
401 West A Street, Suite 1200
San Diego, CA 92101
Phone: (619) 610-7600
Fax: (619) 610-7601

July 2019

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LIST OF ATTACHMENTS

Attachment

- 1 Environmental Initial Study/ CEQA Checklist G
- 2 Key Proposed General Plan Edits and Coastal Act Consistency Summary
- 3 Local Coastal Program Implementation Plan Zoning Ordinance Revisions
- 4 Public Review Period Comments

Abbreviations and Acronyms

AB	Assembly Bill
ADT	average daily traffic
ARB	California Air Resources Board
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CAP	Climate Action Plan
CBC	California Building Code
CCE	Community Choice Energy
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
CERT	Community Emergency Response Team
City	City of Imperial Beach
CO	carbon monoxide
CO ₂ e	carbon dioxide equivalent
COPPS	Community Oriented Policing and Problem Solving
CUP	Conditional Use Permit
DTSC	California Department of Toxic Substances Control
EPA	U.S. Environmental Protection Agency
ESHA	Environmentally Sensitive Habitat Area
EV	electric vehicle
GHG	greenhouse gas
GP	General Plan
IP	Implementation Plan
JURMP	Jurisdictional Urban Runoff Management Program
LCP	Local Coastal Program
LUP	Land Use Plan
MRZ	Mineral Resource Zone
MS ₄	San Diego Regional Municipal Separate Storm Sewer System
MT	metric ton
NAAQS	National Ambient Air Quality Standards
ND	Negative Declaration
NPDES	National Pollution Discharge Elimination System
PHEV	plug-in hybrid EV
PM ₁₀	particulate matter less than 10 microns in diameter
PM _{2.5}	particulate matter less than 2.5 microns in diameter
PV	photovoltaic
RAQS	Regional Air Quality Strategy
RIB	Resilient Imperial Beach
RPS	Renewable Power Standard
RTIP	Regional Transportation Improvements Program
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Board
SANDAG	San Diego Association of Governments
SB	Senate Bill

Scoping Plan	Climate Change Scoping Plan
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDG&E	San Diego Gas and Electric
SIP	State Implementation Plan
SR	State Route
SWPPP	Storm Water Pollution Prevention Plan
TAC	toxic air contaminant
TCM	Transportation Control Measure
TIRCP	Transit and Intercity Rail Capital Program
TRNERR	Tijuana River National Estuarine Research Reserve
UBC	Uniform Building Code
VMT	Vehicle Miles Traveled
WOTUS	Waters of the United States



Final Negative Declaration

July 2019

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

General Plan (GP)/Local Coastal Program (LCP) Update and Climate Action Plan (CAP) for the 2019 Resilient Imperial Beach (RIB) Project. MF 1234:

The Imperial Beach General Plan/ Local Coastal Program (LCP) and Climate Action Plan (CAP) Project provides updated policy direction to improve the City's resiliency to sea level rise and climate change while also advancing the City's environmental, economic, and community goals. Further, the City of Imperial Beach's (City) longstanding vision to maintain the City's "small town, quiet, casual atmosphere" while increasing economic stability and improving environmental quality is a major focus of the GP/LCP, and CAP. A city's General Plan guides near-term and long-term growth and development in the community, and because 87% of Imperial Beach is within the Coastal Zone, the General Plan also includes the LCP. An LCP is a plan to guide development in the Coastal Zone. It establishes land use, development, and environmental policies for the area designated as the Coastal Zone by the California Coastal Commission. The LCP consists of two parts: A Land Use Plan (LUP) and an Implementation Plan (IP). The LUP specifies the location, type, and scale of uses of land and water. The IP ensures that the objectives of the LUP are achieved. The CAP establishes a roadmap for the City to meet the 2020 and 2030 greenhouse gas reduction targets and become a more sustainable, adaptable, and resilient community. The project emphasizes long-term collaboration at all levels of government, the private and non-profit sectors, and Imperial Beach residents for successful long-term General Plan/LCP and CAP implementation.

B. ENVIRONMENTAL FINDINGS:

This Negative Declaration has been prepared in accordance with California Environmental Quality Act (CEQA) Guidelines Sections 15070 through 15075. A public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

- (a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- (b) The initial study identifies potentially significant effects, but:
 - (1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
 - (2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

This Negative Declaration (ND) is composed of this document along with the Environmental Initial Study, which, pursuant to CEQA Guidelines Section 15063 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.

The ND was advertised and circulated for public review from March 25, 2019 through May 15, 2019, in accordance with CEQA, and the ND was routed for state agency review through the Clearinghouse for the same period.

C. MITIGATION MEASURES:

None required.



James Nakagawa, AICP
Imperial Beach City Planner

Attachments:

1. Environmental Initial Study/ CEQA Checklist Appendix G
2. Key Proposed General Plan Edits and Coastal Act Consistency Summary
3. Local Coastal Program Implementation Plan Zoning Ordinance
4. Public Review Period Comments and Responses to Comments

**General Plan/ Local Coastal Program (LCP) Update and Climate Action Plan (CAP) for the
2019 Resilient Imperial Beach (RIB) Project MF 1234**

**California Environmental Quality Act (CEQA)
Environmental Initial Study**



Project Title: General Plan/ Local Coastal Program (LCP) Update and Climate Action Plan (CAP) for the 2019 Resilient Imperial Beach (RIB) Project. MF 1234

Submittal Date: March 25, 2019

Lead Agency: City of Imperial Beach
Community Development Department
825 Imperial Beach Boulevard
Imperial Beach, CA 91932
Ph (619) 628-1356
FAX (619) 429-9770

Project Contact: Jim Nakagawa, AICP, City Planner
Community Development Department

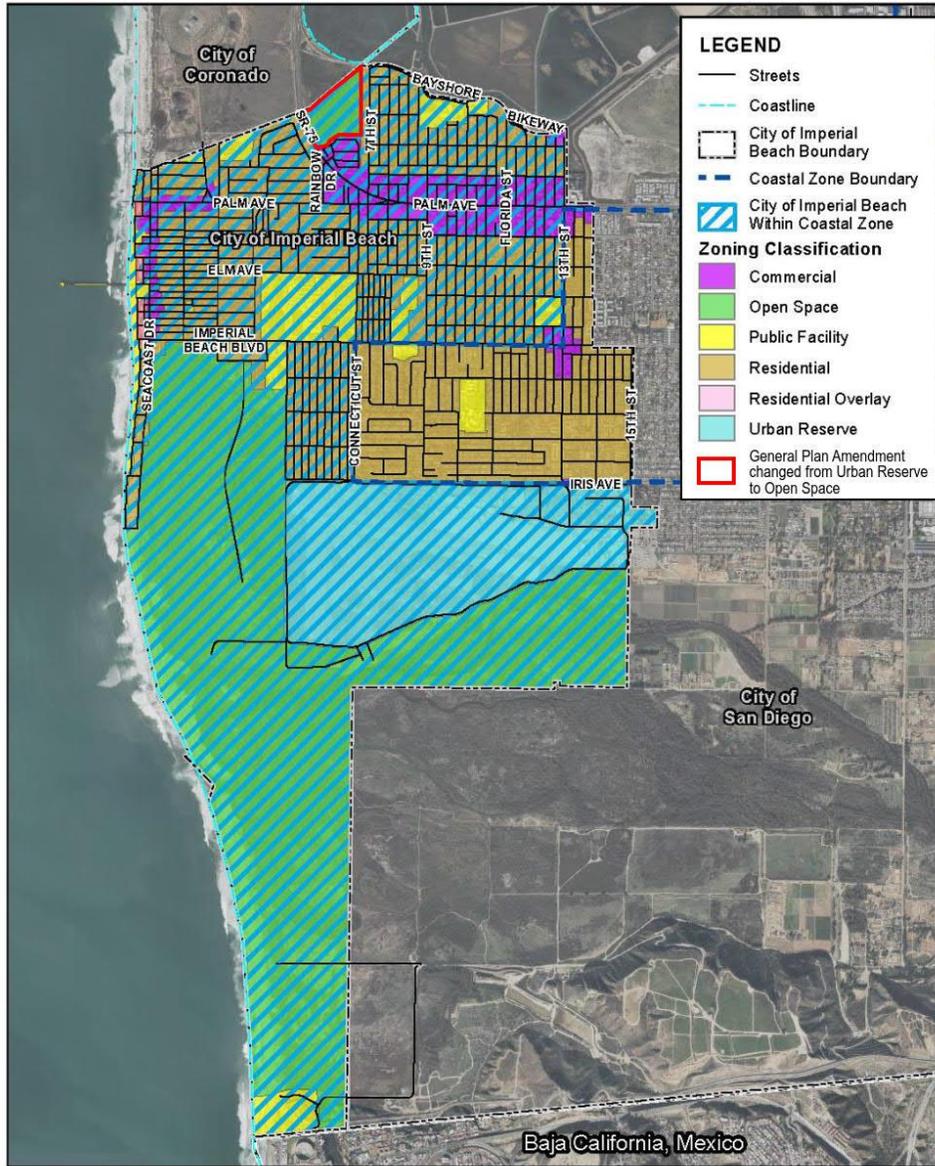
Project Sponsor: City of Imperial Beach
Community Development Department
825 Imperial Beach Boulevard
Imperial Beach, CA 91932

Project Location:

The City of Imperial Beach, the “Most Southwesterly City in the Continental United States,” is one of 18 incorporated cities located in San Diego County. The City is bordered on the north by the YMCA Camp Surf and the Naval Base Coronado Coastal Campus, which are within the City of Coronado’s jurisdiction, and by the southern shore of San Diego Bay; on the east by the City of San Diego; on the south by the United States/Mexico border; and on the west by the Pacific Ocean. Imperial Beach has an area of approximately 4.5 square miles. Figure L-1 shows the project boundaries and location.

Project Description:

The proposed action is the adoption of the City of Imperial Beach General Plan/Local Coastal Program update and Climate Action Plan. In Imperial Beach, 87% of the City is in the Coastal Zone. Accordingly, the City has chosen to use its entire General Plan as its Land Use Plan (LUP), and its complete Zoning Ordinance as the Implementation Plan (IP). The IP/Zoning Ordinance is implemented primarily through the Coastal Development Permit (CDP) process. The City’s General Plan and Zoning Ordinance also help shape and guide public projects and policy decisions that serve to implement the California Coastal Act, as well as other City goals.



Source: SanGIS 2014, 2017, City of Imperial Beach 2017, California Coastal Commission 2006

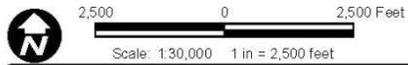


FIGURE L-1
LAND USE MAP
LOCAL COASTAL PLAN UPDATE
IMPERIAL BEACH

The project components and required actions include:

Project Component	Description	Action
General Plan/Local Coastal Program – Land Use Plan Update	Focused policy updates summarized in Attachment 2, plus one land use change: Urban Reserve to Open Space (Figure L-1)	City Council adoption and Coastal Commission certification
Local Coastal Program – Implementation Plan Update	Focused amendments to the City's Zoning Ordinance (Attachment 3)	City Council adoption and Coastal Commission certification
Climate Action Plan	Preparation of the City's first Climate Action Plan	City Council adoption

California Environmental Quality Act (CEQA) Guidelines Section 15265 indicates that CEQA shall not apply to activities and approvals necessary for the preparation and adoption of a local coastal program. However, because this project contains broader citywide General Plan policies, implementation activities, and a related Climate Action Plan, the entirety of these actions are being described and considered within this document. These components are further described below.

General Plan/Local Coastal Program – Land Use Plan Update

The Imperial Beach General Plan (GP)/Local Coastal Program (LCP) is the City's constitution for physical development and change within the City. The GP is a legal mandate that governs both private and public actions. State law requires every California city to adopt a GP that contains seven mandatory topics called "elements," but gives each city flexibility in how elements are named and organized. The Imperial Beach GP Land Use, Mobility, Conservation and Ecotourism, Housing, Land Use, Noise, Open Space, and Safety elements are mandatory elements. Imperial Beach has added Design; Facilities and Services; and Parks, Recreation, and Coastal Access as optional elements. All elements carry equal weight and are designed to be consistent with each other. The Housing Element (updated in 2013) and Noise Element were not included in this GP/LCP update.

Eighty-seven percent of Imperial Beach lies within the Coastal Zone. The Coastal Act of 1976 requires the City to have an LCP certified by the State Coastal Commission. The Imperial Beach GP/LCP is a combined document meeting both State of California GP requirements and LCP requirements. This 2019 GP/LCP update replaces a plan that was adopted by the City in 1994. Since then, climate change and resiliency, environmental justice, housing, sustainability, community health, economic prosperity, multi-modal mobility, and sea level rise issues have become issues of concern at the state and regional government levels. The updated plan addresses these and other issues in a manner that makes sense for Imperial Beach and furthers local goals. Key proposed changes from the existing, adopted GP are summarized below and detailed in Attachment 2.

The proposed GPLCP works to further implement Imperial Beach's Mission Statement *"To maintain and enhance Imperial Beach as "Classic Southern California"; a beach-oriented community with a safe, small town, family atmosphere, rich in natural and cultural resources."* It also focuses on working toward achieving the environmental and economic stability needed to build resiliency and retain the community character valued by residents.

The GP/LCP is divided into the elements (chapters). Each element starts with “Goals” that express a desired end state, followed by a brief “Background” section that describes the legal framework for each element and how it relates to Imperial Beach’s unique attributes. Subtopics within each element are introduced with a “Discussion” section that provides context for the policies that follow. Policies in each section are written as concise, action-oriented statements that establish explicit directives for both public and private actions aimed at preserving and creating a desirable Imperial Beach. Key content of each of the elements is described below.

Land Use Element

The Land Use Element establishes the framework for development of the City, providing for the general distribution, location, and extent of the use of public and private land. This Element focuses on residential, commercial, and mixed-use land uses. The Parks, Recreation, and Coastal Access Element addresses land uses related to open space and recreation.

The Element includes both land use maps and text. The policies and maps have been harmonized with all other elements and policies of the GP/LCP. All elements of the GP/LCP carry equal weight and the Land Use Element does not supersede other elements. Specifically, the Land Use Element:

- Furthers the “Big Picture” goal of retention and enhancement of a small beach-oriented town, while also advancing focused development and growth of the tourism industry.
- Supports sustainable development through providing opportunities for transit-served, mixed-use, infill development with complementary Mobility and Urban Design Element policies.
- Establishes the City’s land use framework through the Land Use Map and identification of Land Use Designations that are applied to every parcel in the City. No land use changes are proposed with the exception of Salt Pond 10A, as described below and shown in Figure L-1.
- Continues efforts to enhance the Seacoast Corridor and the Palm Avenue/State Route 75 Commercial/Mixed-Use Corridor.
- Encourages creation of an ecotourism/recreation corridor along the Imperial Beach Bayfront.
- Continues to maintain Open Space as the City’s predominant land use designation. One land use change is proposed: Salt Pond 10A would be designated “Open Space” rather than its current “Urban Reserve” designation (see Figure L-1).
- Works toward achieving environmental justice and a healthy Imperial Beach community.

Mobility Element

The Mobility Element establishes the framework for the City’s approach to Complete Streets, regional access, and the increased use of active transportation to reduce air pollution and greenhouse gas (GHG) emissions while improving health. The element:

- Includes goals, policies, and a Street Typology System for “Complete Streets” where the needs of pedestrians, cyclists, and transit users, as well as vehicles are addressed, and vehicle miles traveled and GHG emissions are reduced.
- Advances active living policies that complement the Land Use Element’s sustainability and healthy community policies.

- Recognizes and supports the growing role of innovative technology in meeting current and future mobility needs.
- Supports continued collaboration with San Diego Association of Governments (SANDAG) and other agencies to help plan for, operate, and monitor the performance of Imperial Beach's mobility network.
- Strives for the provision of a reasonable amount of parking, where and when it is needed to serve residents, businesses, and visitors.

Conservation and Ecotourism Element

California planning law requires the GP/LCP to include both a Conservation Element and an Open Space Element to address the conservation, development, and use of natural resources; and the importance of open space for habitat and conservation, recreational, and visual resource uses. Because conservation and open space issues are closely interrelated, they are discussed in this element with respect to conservation of resources; and in the Parks, Recreation, and Coastal Access Element with respect to recreation and visual resource purposes. In addition, this Conservation and Ecotourism Element serves as the Water and Marine Resources component of the Imperial Beach LCP and meets the intent of the Environmentally Sensitive Habitat Areas (ESHAs) component of the Coastal Act. The element:

- Provides policy support for preparation and monitoring of the City's Climate Action Plan, and guidance on securing greenhouse gas emissions reductions.
- Calls for an increase in the City's tree canopy to achieve multiple benefits.
- Continues the City's longstanding commitment to preserving and enhancing the San Diego Bay and Tijuana River Estuary for their ecological and open space values.
- Seeks improvements to water quality which are critical to maintaining the City's public health, visitor economy and overall quality of life.
- Highlights the interdependence of the City's conservation and economic development/ecotourism strategies.
- Within current land use designations and zones, supports Bayfront visitor-commercial uses in manner that respects and showcases the City's natural resource amenities.
- Recognizes new methods such as "blue carbon" for carbon capture.

Parks, Recreation and Coastal Access Element

The Parks and Recreation Element is an optional element of the GP/LCP, while the Coastal Public Access section is required by the California Coastal Act. Additional complementary policies are found in the Conservation and Ecotourism Element, and the Mobility Element. This element focuses on the recreational value of the City's parks and beaches, and specifically:

- Recognizes that Imperial Beach's coastline, ocean, parks, and open space preserves define its character, contribute to a healthy environment, and support the economy.
- Seeks to serve the public with parks, coastal access, and amenities, and recognizes the role of parks in healthy communities.
- Emphasizes the importance of joint use and coordination with other government agencies to meet current and future park and recreation needs.
- Identifies coastal access, in accordance with the Coastal Act.
- Includes new strategies to address sea level rise access impacts and improve resiliency.

Facilities and Services Element

The Facilities and Services Element provides guidance on how to meet future needs as the City continues to change. Funding to meet these needs will come from a variety of sources that must be considered in the annual capital improvement and budget planning processes. Not all services and facilities discussed in the element are under the direct control of the City. However, the policy commitments of the City affect the ability of other agencies to provide appropriate levels of service to Imperial Beach residents and visitors. Mobility facilities are discussed in the Mobility Element, and parks and recreational facilities are discussed in the Parks, Recreation and Coastal Access Element of this Plan. The Facilities and Services Element:

- Provides baseline facilities information.
- Calls for the timely provision of public facilities.
- Supports relocation of the Public Works Yard to open its Bayfront location.
- Includes goals and policies to consider sea level rise in planning and design, complementary to the Conservation and Ecotourism, and Safety elements.
- Includes composting and green infrastructure policies, complementary to Conservation and Ecotourism Element climate planning policies.

Safety Element

California GP/LCP law requires the Safety Element to address means of protecting the community from unreasonable risks associated with fire, flood, climate change, and geologic and seismic hazards. This element also implements provisions of the California Coastal Act pertaining to minimizing hazard potential in the Coastal Zone. The Safety Element:

- Maintains goals for safety protection and shoreline management.
- Includes goals and policies for climate change preparedness and increased resiliency, complementary to the Conservation and Ecotourism, and Facilities and Services elements.
- Recommends new sea level rise adaptation strategies organized around a tailored trigger approach that considers environment, economic, and social values, and a systems approach to problem solving.
- Calls for continued collaboration with other government agencies that share responsibility and jurisdiction over Imperial Beach's shoreline, preserved open spaces, and coastal waters.
- Includes disaster preparedness policies and anticipates an update to the County's Multi-Jurisdiction Hazard Mitigation Plan.

Design Element

The Design Element is an optional GP/LCP topic under the state planning law. The intent of this Element is to meet Coastal Act requirements for the protection of scenic and visual qualities of the City and promote integrity of the community's small beach-town character. The Design Element:

- Recognizes the importance of visual quality.
- Provides guidelines to support the design review function.
- Provides goals and policies for commercial and mixed-use development, and sustainable coastal development, complementary to the Land Use Element.
- Identifies prominent public coastal views in accordance with Coastal Act (Figure D-1).

- Complements the Land Use, Mobility, and Conservation and Ecotourism elements with goals and policies supporting mixed use corridors, transit and walkable design, sustainable development, and urban forestry.

Local Coastal Program – Implementation Plan Update

The Zoning Ordinance is a part of the Municipal Code. Its purpose is to protect and promote the public health, safety, morals, peace, comfort, convenience, and general welfare. It is intended to implement the City's GP/LCP Land Use Plan. The Zoning Ordinance consists of a Land Use/Zoning Map, described in Chapter 19.06, designated zones; regulations controlling the uses of land, the density of population, the uses and locations of structures, the height and bulk of structure, the open space about structures, the appearance of certain uses and structures, the area and dimensions of sites, the location and size of signs, requirements for off-street parking; and other regulations.

The Zoning Ordinance comprises Title 19 of the Imperial Beach Municipal Code. Title 19 is further organized by numbered chapters, sections, and subsections addressing land development topics. It is available online at <https://qcode.us/codes/imperialbeach/>.

Proposed amendments to the Zoning Ordinance are summarized below and shown in further detail in Attachment 3.

Since February 13, 1985, the City of Imperial Beach has been issuing CDPs under its certified LCP. The project includes minor amendments to the City's Zoning Ordinance, which continues to serve as the LCP/IP. The project includes Zoning Ordinance revisions that fall under three categories:

- 1) **NEW ITEMS** – are amendments designed to implement the updated LCP/LUP.
- 2) **CLARIFYING MATTERS** – City staff has found language within the existing Municipal Code that requires further clarification to meet the original intent of the policy/code.
- 3) **ZONING – CLERICAL MATTERS** - City staff has found clerical errors within the existing Municipal Code that requires revision.

Development Permit Process

The Zoning Ordinance is and will continue to be implemented through the development review process and the issuance of permits. Permits can be discretionary or administrative. Discretionary permits are those that require the exercise of judgment or deliberation by staff, a review board, or the City Council to approve or disapprove the activity or development. Discretionary permits are reviewed against the policies and standards contained within the GP/LCP and Zoning Ordinance. For example, the City's Complete Streets and parking management policies will be implemented through private and public projects that are designed in accordance with the GP's Mobility Element and Urban Design Element policies.

In contrast to discretionary permits, administrative permits are those that can be approved through determination that it complies with via a set of objective standards. Objective standards can also be effective GP/LCP implementation tools, with the added advantage of providing more certainty to the development process. While CDPs are the key mechanism to implement Coastal Act policies, the City of Imperial Beach also uses other permit types, and discretionary, as well as administrative, permit procedures to implement a wide range of GP/LCP goals and policies. City permit types include:

- Coastal Development Permit. CDPs are the regulatory mechanism by which proposed developments in the Coastal Zone are brought into compliance with the Coastal Act. After the Coastal Commission certifies an LCP, most CDP authority is delegated, and CDP applications are then reviewed and acted on by the local jurisdiction. But the Commission has permanent ongoing responsibilities: it retains continuing permit jurisdiction over certain specified lands (such as tidelands and public trust lands), and it has appellate authority over specified categories of development.
- Under its certified LCP, the City of Imperial Beach has the authority to issue most of the CDPs within its jurisdiction. A CDP is required for any project involving development or repair and maintenance activity in areas designated as within the City's coastal boundary, except for projects determined to be exempt pursuant to Section 19.87.040 of the Imperial Beach Municipal Code. The City has posted information on its website to inform applicants of the basic submittal requirements needed to allow staff to accurately analyze and process a CDP application. A CDP may be granted administratively (staff review only), or may require a discretionary review with a public hearing before the City Council for approval.
- Coastal Development Permit Exemptions are stated in Zoning Ordinance Section 19.87.040.
- Conditional Use Permit. A Conditional Use Permit (CUP) is required for certain land uses that may exhibit unusual characteristics and, therefore, need to be reviewed for compatibility with nearby uses and the uses permitted by right in a particular zone.
- Design Review. The Design Review procedure is established to ensure that new development, or the alteration of existing development, occurs in a manner that enhances the character and quality of surrounding properties and that the scale, special relationships, and architectural treatment of structures including materials, colors, and design visually contribute to the areas and environment in which they are located. Design Review may be administrative (staff review only) or may require approval of the Design Review Board. The adopted Design Manual and Design Review Guidelines, and any additional specific guidelines for a particular area will be used in analyzing the Design.
- Zone Change/General Plan Amendment. The Zone Change/General Plan Amendment procedure is established to allow for the reclassification of the designated zone for a property, and to bring the property into conformance with the GP. The granting of a Zone Change/General Plan Amendment requires City Council approval and certification by the Coastal Commission.
- Site Plan Review. The Site Plan Review procedure is established to review certain property development proposals to ensure the best and most appropriate site development of the property in certain zoning districts. Site Plan Review may be administrative (staff review only) or may require approval of the City Council.
- Variance. A Variance procedure is established to provide for a reasonable use of a property having unique characteristics by virtue of its size shape, topography, location, or surrounding. The granting of a Variance is a discretionary act that allows for variation or departure from the established regulations, except for permitted use, of any particular zone. A Variance generally requires a public hearing before the City Council for approval. However, an adjustment of up to 10% of any development standard listed in the Imperial Beach Zoning Code, excluding density, parking, and height requirements, may be granted administratively.

Climate Action Plan

The City of Imperial Beach CAP includes a 2012 GHG baseline inventory; forecasted emissions for 2020, 2030, and 2050; and measurable strategies and actions the City will implement to achieve emission reductions. The CAP targets emission reductions below 2012 levels of 4% by 2020 and 42% by 2030, consistent with state guidance in support of state efforts under Assembly Bill (AB) 32 and Senate Bill (SB) 32. The CAP also serves to align the City's reduction efforts with Executive Order S-3-05, which sets a goal of reducing statewide emissions by 80% by 2050.

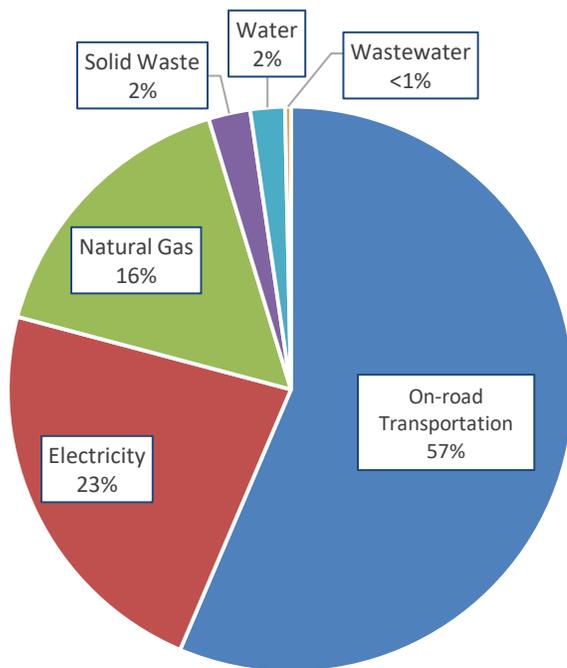
While the core impetus behind a CAP is to reduce GHG emissions responsible for human-induced climate change, it also has an effect on multiple other important factors including the health of the Imperial Beach economy, people, and natural resources. These co-benefits of the CAP include, but are not limited to, improved air and water quality, energy efficiency, water conservation, and cost savings. In total, the CAP is intended to position Imperial Beach to contribute to state and global efforts to reduce GHG emissions, stave off the worst impacts of climate change, and become more resilient in the face of the climate change impacts that can no longer be avoided.

The CAP has been developed in parallel with the City of Imperial Beach GP/LCP update. The CAP is one of the critical components in the City's vision to become more sustainable, expand its eco-tourism and recreational economy, and support state goals to reduce emissions to 1990 levels by 2020 and 40% and 80% below 1990 levels by 2030 and 2050, respectively. It is also consistent with the City's broader emphasis on establishing policies and pursuing investments that preserve and enhance the economy, environment, and community character of Imperial Beach. In formulating the CAP, the City focused on feasible targets and measures that are expected to be locally achievable within the fiscal and technical capacity of the City and have community support.

Baseline Emissions and Reduction Strategies

The CAP provides an overview of the City's GHG emissions profile, 2012 GHG baseline inventory, selected reduction targets, and measures and strategies that have been identified to meet those targets. The 2012 inventory consists of 96,400 metric tons (MT) of carbon dioxide equivalent (CO₂e), with transportation, electricity, and natural gas emissions collectively accounting for approximately 96% of the total (Figure 1.1). The City selected emission reduction targets for 2020 and 2030 of 4% and 42% below 2012, respectively (Table 1.1). These are consistent with state targets using a 2012 inventory baseline to estimate reductions needed to meet 1990 emissions under AB 32 and a 40% reduction below 1990 levels under SB 32. The methodology utilized in the selection process is detailed more fully in Chapter 3 and the technical appendices of the CAP (City of Imperial Beach, 2019a). Emissions reductions that would be needed to meet the long-term goals set in Executive Order S-3-05 are also included; however, the strategies and measures are geared toward achieving reductions through the CAP's 2030 horizon year (Table 1.2). The 2020 target will be met without the need for any local actions. As a result, the measures and strategies are only listed with their estimated contribution toward achieving the 2030 CAP target.

Figure 1.1 Imperial Beach 2012 GHG Emissions Inventory by Category



Percentage may not add to totals due to rounding.
Energy Policy Initiatives Center, 2018

Table 1.1 Emissions Projection, Reduction Targets, and Emissions Reduction Needed				
Year	Business-as-Usual Projection (MT CO ₂ e)	Target Emission Level (% below baseline)	Target Emission Levels (MT CO ₂ e)	Emissions Reduction Needed to Meet Target (MT CO ₂ e)
2012	96,400	-	-	-
2020	81,100	-4%	92,700	-11,500
2030	82,200	-42%	55,900	26,300

*Emissions values are rounded.
*Energy Policy Initiatives Center, 2018.

Of the 26,300 MT CO₂e reductions needed to meet the CAP's 2030 target, 6,454 MT CO₂e are estimated to come from local efforts included in the CAP strategies and measures. This amounts to approximately 25% of total reductions, while the other 75%, 19,992 MT CO₂e, are estimated to result from federal and state actions.

Summary of Imperial Beach CAP Reduction Strategies

Emissions Category	Reduction Strategies and Measures	2030		
		MT CO ₂ e	% of Local Reductions	
On-Road Transportation	Strategy: Clean and Efficient Transportation			
	T.1	Increase Citywide EV Charging Stations	751	11%
	T.2	Clean Municipal Fleet	48	1%
	Strategy: Reduce Vehicle Miles Traveled (VMT)			
	T.3	Increase Mass Transit Ridership	687	10%
	T.4	Improve Pedestrian and Bicycle Facilities	342	5%
	T.5	Reduce Municipal Employee VMT	13	<1%
Energy*	Strategy: Increase Renewable Electricity			
	E.1	Increase Grid-Supply Renewables	1,204	17%
	E.2	Increase Commercial Solar PV	59	1%
Waste	Strategy: Zero Waste			
	W.1	Divert Waste from Landfill	3,318	51%
Carbon Sequestration	Strategy: Carbon Sequestration			
	S.1	Tree Planting	31	<1%
Total GHG Reductions Needed to Reach 2030 Target		6,454 MT CO₂e		
Total Potential GHG Reductions from Local Measures		6,454 MT CO₂e		
* The Energy emissions category consolidates natural gas and electricity categories from Figure 1.1.				

Summary of Key Project Policies and Implementation Activities

Although no specific development or infrastructure improvements or facilities are identified with the project components, several new policies and implementation programs could encourage new development and construction activities to occur throughout the City that could have environmental impacts. These include but are not limited to:

- Promote the Seacoast Corridor as a commercial and mixed-use area that maintains and enhances the visitor-serving, pedestrian-oriented character of the area.
- Enhance coastal access and recreation through creation of an ecotourism/recreational corridor along the Imperial Beach Bayfront incorporating bicycle and pedestrian paths and complementary uses.
- Include Complete Streets policies.
- Explore the potential for an expanded multi-modal transfer station on former State Route (SR) 75/Palm Avenue.
- Increase the City's urban tree canopy cover and maximize the benefits of trees.
- Explore opportunities to relocate the City Public Works Yard to make the site and other suitable San Diego Bay shoreline properties available for visitor serving and ecotourism purposes.
- Implement a signage and wayfinding program.
- Support joint use programs with schools.
- Adopt sea level rise adaptation measures and monitoring program.
- Encourage development to use sustainable or "green" building practices to conserve energy and water.
- Change salt pond 10A from Urban Reserve to Open Space as shown in Figure L-1.

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"/> Aesthetics | <input type="checkbox"/> Agricultural Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology/ Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/ Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/ Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings |

DETERMINATION:

On the basis of this initial evaluation:

- I find that the proposed project **COULD NOT** have a significant impact on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- I find that although the proposed project could have a significant impact 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 project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- I find that the proposed project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated" impact 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 an 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 1) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and 2) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Prepared by: Jim Nakagawa



Department Representative: City Planner

Date: March 25, 2019

ATTACHMENT 1
ENVIRONMENTAL INITIAL STUDY/ CEQA CHECKLIST APPENDIX G

Environmental Checklist

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
I. AESTHETICS Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a) The City of Imperial Beach is located along the coast of the Pacific Ocean, with scenic views of the ocean that can be seen from many areas of the City. In addition, the City’s GP/LCP specifies the Tijuana River Estuary, Naval Outlying Landing Field, City Beach and the Salt Evaporation Ponds/ South San Diego Bay as scenic reserves. The update to the LUP does not propose any land uses that would negatively impact these scenic vistas as the Salt Pond 10A land use designation would protect the salt pond as Open Space. The project also does not propose any measures or policies that would directly affect scenic vistas. In fact, the IP update provides additional criteria and CUP findings for when projects are seeking height or density increases, and the Design Element of the GP/LCP includes policies aimed at improving the aesthetic quality of the existing developed public areas and coastal access areas. Also, Policies 3.1.16 and 3.2.7 require that expansion of signage and wayfinding signs for key facilities and areas within the City such as the beach, pier, Tijuana River Valley, Border Field State Park, etc. will be scaled and designed for, as well as not to block, any scenic vistas.

The CAP proposes measures that would aid in reducing the City’s GHG emissions and, thus, would not directly lead to any development that would affect scenic vistas. However, the proposed measures encourage enhanced street tree planting and the installation of solar photovoltaic (PV) systems on new or redeveloped commercial development. Future solar PV systems will be installed through the City’s permit process and consistent with the Citywide Design Guidelines and will not block or damage any scenic vistas. Also, in accordance with GP/LCP Policy 8.1.2, new tree plantings would be chosen as to not block public views at maturity. A less than significant impact would occur with this issue.

b) Beginning at the northern boundary of Imperial Beach, SR-75 traveling north is an officially designated State Scenic Highway (Caltrans 2018). SR-75 runs along a spot of sand between the Pacific Ocean and the San Diego harbor between Imperial Beach and Coronado. It is anchored by the Coronado Bridge (Caltrans 2018). Previous reviews of historical records for the Imperial Beach area indicated that there are no identified historical sites of major importance. In terms of historical

resources, there appears to have been a U.S. cavalry post on the present site of Westview Elementary School. There is also photographic evidence that at one time a "wave-action" device was constructed at or near the municipal pier. The purpose of this device was apparently to harness the energy from the waves falling to shore. No development or policy is proposed that would damage trees, rock outcroppings, or historic buildings within a scenic highway. Therefore, this would be a less than significant impact.

c) The Design Element of the GP/LCP meets Coastal Act requirements to protect the scenic and visual qualities of the City and promote integrity of the community's small-town character. The project recommends enhancing public coastal access with creation of linear park or other activating uses along the City front and enhancement of Seacoast Corridor and Palm Avenue/SR 7 as a commercial/ mixed-use corridor. Further, the policies proposed as part of the project include policies aimed at improving the aesthetic quality of these public areas through preservation of small beach town character, harmonious development design, and other visual considerations. These requirements would improve the visual character of public views. Additionally, a map of view corridors was created for the updated LUP, which is an effort to protect and enhance public views, which are described under new Policies 8.1.1 and 8.3.2. Policy 8.1.2 protects public views to the beach, bay, and estuary as well as to other scenic resources from public views (see Figure D-2). Policy 8.2.7 supports long-term maintenance and community revitalization to retain and enhance the attractive, human-scale, beach-oriented small-town atmosphere.

The CAP is a policy-level document and does not propose any specific development. However, the CAP encourages the installation of solar PV on new or redeveloped commercial buildings. These installations are anticipated to be consistent with Citywide Design Guidelines and Zoning to transition with the existing urban environment. The CAP also proposes the planting of 866 trees by the year 2030. In accordance with GP/LCP Policy 8.1.2, these trees would be chosen as to not block public views at maturity. Therefore, the impact to visual character would be less than significant.

d) The GP/LCP does not propose any development or policies that would create a new source of substantial light or glare that would adversely affect day or nighttime views. The CAP includes measures related to the installation of solar PV systems on public facilities, and new or redeveloped commercial. However, solar PV systems are specifically designed to absorb sunlight, not reflect it. Thus, their placement and orientation on commercial or public facilities would not adversely affect daytime or nighttime views in the City. Therefore, a less than significant impact would occur.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
<p>II. AGRICULTURE AND FOREST 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 (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
<p>a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>d) Result in the loss of forest land or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

a) No lands within the City of Imperial Beach limits are designated for agricultural use, according to the Imperial Beach GP. No land use changes have been proposed for agricultural use in the LUP. Pursuant to the Farmland Mapping and Monitoring Program, the project site is designated as Urban and Built Up Land (California Department of Conservation 2018). The project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. The project would result in no impact to agricultural resources.

b) As stated above, there are currently no agricultural zoning designations within the City of Imperial Beach. No land within the City of Imperial Beach is subject to the Williamson Act contract. The project

would result in no impact to agricultural zoning districts or to land that is subject to a Williamson Act contract.

c) There are no existing districts in the City of Imperial Beach that are zoned for forest land or timber land. The policy changes of the GP/LCP would result in no impact to forest land, timberland, or to forest or timber land zoning districts.

d) As mentioned above, the City of Imperial Beach does not have any land that is designated or zoned for forest use. No impact related to forest land conversion would occur.

e) As mentioned above, no lands within the City limits are designated for agricultural use or timer land use, according to the updated LUP. There is no farmland or forest land within the zoning districts. The CAP does not encourage conversion of Farmland or forest land to non-agricultural or non-forest use. The project would result in no impact by the conversion of agricultural timber land resources.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
III. AIR QUALITY 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:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emission (such as those leading to odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a) The project is located within the San Diego Air Basin (SDAB) under the jurisdiction of the San Diego Air Pollution Control District (SDAPCD). The SDAB currently meets the National Ambient Air Quality Standards (NAAQS) for all criteria air pollutants except ozone and is classified an attainment/maintenance area for carbon monoxide (CO), and unclassifiable for particulate matter less than 10 microns in diameter (PM₁₀). The SDAB is currently classified as a nonattainment area under the California Ambient Air Quality Standards (CAAQS) for ozone, PM₁₀, and particulate matter less than 2.5 microns in diameter (PM_{2.5}). The primary purpose of an air quality plan is to bring an area that does not attain the NAAQS or CAAQS into compliance with those standards pursuant to the requirements of the Clean Air Act and California Clean Air Act.

Nonattainment areas must submit a State Implementation Plan (SIP) outlining the combination of local, state, and federal strategies aimed at bringing the area into attainment. To address this requirement, the SDAPCD updated its Attainment Plan for the 2008 Eight-Hour Ozone Standard (Attainment Plan) and Regional Air Quality Strategy (RAQS) in 2016 (SDAPCD, 2016). The RAQS include control measures that have been adopted or are scheduled for review and possible adoption to improve air quality and protect public health. Some of the measures include the Transportation Control Measures (TCMs), which include improvements to transit, vanpools, high-occupancy vehicle lanes, park-and-ride facilities, bicycle facilities, and traffic signal improvements, consistent with program commitments made in the 2050 Regional Transportation Plan (RTP) and the 2014 Regional Transportation Improvements Program (RTIP). The RTP and RTIP are adopted and implemented by SANDAG.

A project's consistency with the RAQS and Attainment Plan is based on whether the project would exceed the estimated air basin emissions, which are based in part on equipment use assumptions, projections of population, and vehicle miles traveled (VMT). As discussed in more detail in Section XI. Land Use and Planning, the LUP maintains most of the existing land use designations, with the exception of the Salt Pond 10A area, which would be designated as "Open Space" rather than its current "Urban Reserve" designation. This proposed land use change goes from a more intensive

(would potentially have higher emissions) land use designation to a less intensive (lower emissions) land use designation and would not increase population or VMT beyond that considered in the RAQS. As such, the GP/LCP would not conflict with the growth assumptions of the RAQS. Additionally, the GP/LCP includes a Mobility Element, which includes goals, policies, where the needs of pedestrians, cyclists, and transit users, as well as vehicles are addressed. Consistent with the TCMs of the RAQS, the GP/LCP includes Complete Streets policies, including Policy 3.1.1, which calls for incorporation of Complete Streets principles into all transportation projects at all phases of development and Policy 3.1.18, which calls for integration of infrastructure or features that improve mobility for pedestrians, bicyclists, and public transit riders of all ages and abilities into all street design projects (City of Imperial Beach 2019b). The Mobility Element also includes policies for coordination and collaboration with SANDAG, other agencies, and local businesses and organizations to implement Transportation Demand Management initiatives included within the RTP (Policy 3.2.4). As such, the GP/LCP would not conflict with or obstruct implementation of the applicable air quality plans.

The purpose of the CAP is to reduce GHG emissions within the City to help contribute to state and global efforts to reduce GHG emissions and become more resilient in the face of climate change impacts. Emission reduction measures within the CAP include reduction in VMT through increase in mass transit ridership and improvement in pedestrian and bicycle facilities, increase in renewable electricity through development of requirements or incentives for installation of solar photovoltaic systems in commercial developments, carbon sequestration, and reduction in solid waste through adoption of a zero-waste policy. In addition to reducing GHG emissions, each of these elements would help to reduce criteria air pollutants. Thus, the CAP would also not conflict with or obstruct implementation of the applicable air quality plans. The impact would be less than significant.

b) Projects have the potential to result in cumulatively considerable net increases of criteria air pollutants during construction (short-term) and operation (long-term); however, the GP/LCP is a policy-level document and does not propose any development projects. Estimating the construction-related emissions of the project's key policies and implementation activities is not possible due to the variability and uncertainties related to future individual projects. Generally, the GP/LCP includes policies that would encourage land uses and improvements that reduce air quality impacts (Policy 2.2.2). In addition, Section 4.5 of the GP/LCP includes planning measures to improve air quality that include but are not limited to working with the SDAPCD to meet state and federal ambient air quality standards (Policy 4.5.1), review of new developments to ensure they meet air quality standards, preferably through the environmental review process (Policy 4.5.2), and purchase of low and zero-emission vehicles for the City's fleet (Policy 4.5.4). Further, any construction activities in the City would undergo project-level CEQA review and would be subject to SDAPCD rules.

Similarly, the CAP establishes a roadmap for the City to meet GHG reduction targets and contains recommended strategies and measures for reducing emissions but does not propose or require development of individual land use projects that would otherwise not occur. The measures in the CAP are not anticipated to generate significant impacts since most measures would result in upgrades to existing uses, such as installation of solar PV systems, planting of new trees, and expansion of electric vehicle (EV) charging infrastructure. In addition to reducing GHG emissions, the CAP also encourages land use patterns and strategies that would help reduce long-term criteria air pollutants. Thus, implementation of the project would be less than significant.

c) Some members of the population are especially sensitive to air pollutant emissions and should be given special consideration when evaluating air quality impacts from projects. These people include

children, older adults, persons with preexisting respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Sensitive receptors include residences, schools, child care centers, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

The greatest potential for toxic air contaminant (TAC) emissions would be related to diesel PM emissions associated with off-road equipment operations. According to the Office of Environmental Health Hazard Assessment, health risk assessments that determine the health risks associated with exposure of sensitive receptors should be limited to the period/duration of activities associated with the emissions activity (OEHHA ,2015). The GP/LCP and CAP do not propose or require any specific development project or policies that are expected to expose sensitive receptors to substantial pollutant concentrations. Further, Policy 4.5.3 of the GP/LCP calls for coordination with the SDAPCD in evaluating exposure of sensitive receptors, such as residences, schools, and playgrounds, to TACs, and requires that projects incorporate strategies to protect public health and safety (Policy 4.5.3). Therefore, this impact would be less than significant.

d) Potential sources that may emit odors can occur during construction and operational activities. Construction activities may emit odors associated with exhaust from diesel construction equipment, which could be considered offensive to some individuals. Odors from these sources would be localized and generally confined to the immediate area surrounding the construction site. Several examples of common land use types that would generate substantial odors during operation include wastewater treatment plants, landfills, composting/green waste facilities, recycling facilities, petroleum refineries, chemical manufacturing plants, painting/coating operations, rendering plants, and food packaging plants. As explained previously, the GP/LCP and CAP do not propose or require any specific development projects. Since the GP/LCP and CAP do not propose or require any specific development project, the policies, measures, and strategies of these documents would not result in other emissions (such as those leading to odors) affecting a substantial number of people. As such, any development constructed in the City would undergo project-level CEQA review and would be subject to SDAPCD rules and regulations, including Rule 51, Nuisance. Implementation of the GP/LCP and the CAP would be less than significant.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
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"/>	<input checked="" type="checkbox"/>	<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, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands (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"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a) The GP/LCP and CAP would not modify, either directly or indirectly, habitats of any species identified as a candidate, sensitive, or special status species. The GP/LCP and CAP include measures for improvement related to increasing mass and sustainable transportation, climate resiliency, sustainability, and economic development, all of which would occur primarily within developed and/or infill areas where habitat for listed species would not exist. Furthermore, the City is largely developed and any existing applicable federal, state, and/or local policies would prevent development in areas that support sensitive or special status species. Policy updates to the GP/LCP and measures in the CAP could potentially lead to future development and construction activities. The GP/LCP would require that new projects avoid or minimize impacts to, and provide mitigation for, any adversely impacted special status, threatened, listed, or endangered plant and animal species consistent with all state and federal regulations (GP/CLP Policy 4.3.1). As a result, impacts to habitat supporting listed species would be less than significant.

b) Sensitive habitats within the City, including areas around San Diego Bay and the Tijuana River, have been preserved and protected through City initiatives and partnerships with state and federal agencies. The Tijuana River Estuary is located in the southern part of the City and includes the Tijuana River

National Estuarine Research Reserve (TRNERR) and Tijuana Slough National Wildlife Refuge and Border National Park. Under the GP/LCP, TRNERR is not defined as an ESHA as it is already protected from development with its designation as a Preserve (which is the objective of an ESHA), is under the management of the wildlife agencies, and has a currently established buffer requirement. The current protected status of TRNERR is further emphasized by its designation by the International Ramsar Convention, 2005, as a "Wetland of International Importance."

Open space and conservation planning are fundamental components of the City's GP/LCP. The GP/LCP would increase open space within the City by converting Salt Pond 10A, located along the City's northern border, from Urban Reserve to Open Space. Land designated as urban reserve can be adaptively reused as a different future use; however, land designated as Open Space is set aside for the protection and preservation of sensitive and fragile natural resources (City of Imperial Beach 2019b). By redesignating Salt Pond 10A from Urban Reserve to Open Space, the land would be environmentally protected and carefully managed. Although limited uses of Open Space are allowed through a CUP, future development of the area would be highly constrained.

The GP/LCP and CAP would not modify, either directly or indirectly, habitats of any species identified as a candidate, sensitive, or special status species. Furthermore, the City is largely developed, and any existing applicable federal, state, and local policies would prevent development in sensitive natural communities. Therefore, the impact would be less than significant.

c) Please see analysis IV (b) above. The TRNEER contains one of the largest intact coastal wetland systems in Southern California (City of Imperial Beach 2019b). Under the GP/LCP, TRNEER is designated as open space and is jointly managed by U.S. Fish and Wildlife Service and California State Parks. Studies show that wetland soils sequester carbon at rates 10 to 50 times greater than forest lands. The GP/LCP includes measures to conserve and restore the City's wetlands (Policies 4.3.2-4.3.5, 4.4.3, 4.1.12). Wetlands restoration and protection efforts are known as "blue carbon" strategies. Additionally, the CAP aims to increase carbon sequestration by conserving and protecting habitat within the City boundaries, the Tijuana Estuary, and along the San Diego Bay in collaboration with the previously mentioned partnering agencies or other stakeholders (City of Imperial Beach 2019a).

Furthermore, the GP/LCP and CAP support and focus on enhancing existing developed and infill areas, which do not contain wetlands. Existing applicable federal, state, and/or local policies would prevent development in areas that support federally protected wetlands. Impacts to federally protected wetlands would be less than significant.

d) The GP/LCP and CAP include policies and measures for improvements related to increasing mass and sustainable transportation, climate resiliency, sustainability, and economic development, all of which would occur primarily within developed and/or infill areas. The GP/LCP land use change and policies would not substantially interfere with migratory fish, wildlife species, wildlife corridors, and/or wildlife nursery sites. Although these resources may occur within the City boundaries and in areas subject to resiliency measures, the GP/LCP and CAP do not contain development or policies that could cause direct or indirect impacts to these resources. Specifically, impact avoidance is prioritized in the selection process for the future resiliency measure evaluation and application. As a result, impacts would be less than significant.

e) The GP/LCP includes measures to conserve and protect biological resources, specifically areas designated as Open Space and the protected TRNERR. Additionally, the CAP and GP/LCP include

policies and measures to enhance the existing tree canopy to increase carbon sequestration (Strategy S.1). As a result, impacts to local policies or ordinances protecting biological resources would be less than significant.

f) The City does not have a Habitat Conservation Plan and/or Natural Community Conservation Plan; however, the TRNERR's Comprehensive Management Plan aims to protect, restore, and enhance the viability of the key coastal habitats and species and preserve the region's cultural heritage while encouraging compatible public use, education, and research. Additionally, planning is underway for the Tijuana Estuary Tidal Restoration Program, a large, multi-phased wetland restoration program involving up to 500 acres of restoration (City of Imperial Beach 2019b). The GP/LCP and CAP would not conflict with the provisions of the Comprehensive Management Plan and/or the planned Tijuana Estuary Tidal Restoration Program. The GP/LCP includes measures to conserve and protect sensitive habitats and natural resources by designating these areas as Open Space. The GP/LCP would increase the amount of Open Space by redesignating Salt Pond 10A from Urban Reserve to Open Space. Impacts to approved local, regional, or state habitat conservation plans would be less than significant.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES				
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a) Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical 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 persons important in our 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.

As previously discussed in analysis I (b), Imperial Beach does not contain historical sites of significance. According to the GP/LCP, in terms of historical resources, there appears to have been a U.S. cavalry post on the present site of Westview Elementary School. There is also photographic evidence that at one time a "wave-action" device was constructed at or near the municipal pier. The purpose of this device was apparently to harness the energy from the waves falling to shore.

The GP/LCP has added policies that expand joint use of parks and school sites; enhance public coastal access; implement Complete Streets; and support tourist-related commercial uses, including an ecotourism recreation corridor, expansion of Bayfront visitor-commercial uses, relocation of the Public Works yard, multi-use development, and sea level rise adaptation that could potentially impact unknown historical resources. The CAP encourages tree planting and resiliency construction actions as well. Environmental review of future development projects would permit analysis of potential impacts to historical resources. A case-by-case environmental review of future development would be necessary to ensure consistency with state, federal, and all GP/LCP and CAP goals, objectives, and policies. The GP/LCP specifically includes updated Policies 4.6.1 and 4.6.2 regarding compliance with protocols and maintaining confidentiality of archaeological sites in compliance with SB 18 and AB 52. The City of Imperial Beach complied with notification and consultation requirements of SB 18 and, once the project was initiated, complied with notification and consultation requirements of AB 52. Adherence to applicable City, county, state, and federal standards and guidelines related to the protection/preservation of historical resources, as well as the requirements mandated in the environmental review of individual projects would limit the potential for impacts related to historical resources to a level that is less than significant.

b) According to the GP/LCP, in Imperial Beach there are presently no identified significant archaeological sites. Several sites have, however, been identified; the largest of which covers approximately 10 acres along the Otay River channel along the northern City boundaries. Two smaller sites also have been recorded in the same general area along the farthest southern reach of San Diego Bay. For the most part, these identified sites are composed of the remains of shellfish gathering activities and associated discarded tools. No evidence of permanently inhabited villages has been found to date. All three sites in the northern part of the City are heavily impacted by existing urban uses. Another site has been located and excavated at the far southern end of Imperial Beach at Border Field State Park. All these sites appear associated with the Early Milling La Jolla culture, which dominated the South Bay area between 7,000 and 5,000 years ago. Other sites have reportedly been encountered near the Oneonta Slough during construction activity, although it is not known whether steps were taken to preserve the reported sites or whether it was in fact a true archaeological site.

The GP/LCP and CAP are policy-level documents that do not propose any specific development. Nevertheless, there are policies and measures in the GP/LCP and CAP that could lead to construction and future development within the City. A case-by-case environmental review of future projects would be necessary to ensure consistency with state, federal, and all GP/LCP and CAP goals, objectives, and policies. Adherence to applicable City, county, state, and federal standards and guidelines related to the protection/preservation of historical resources, as well as the requirements mandated in the environmental review of individual projects would limit the potential for impacts related to archaeological resources to a level that is less than significant.

c) There are no specific development projects proposed for the project that would include excavation or grading. There is a remote possibility that ground-disturbing activities that would occur as a result of implementing Complete Streets policies and tree planting as set forth in the CAP could uncover previously unknown human remains. However, this is very unlikely as tree planting would occur in areas that are already developed and previously landscaped or excavated. In the unlikely event that this occurs, compliance with state regulations pertaining to discovery of human remains would ensure a less than significant impact occurs.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
VI. ENERGY Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

a) San Diego Gas and Electric (SDG&E) provides electricity and natural gas service within Imperial Beach. As described in more detail in VI (b) below, the GP/LCP and CAP include policies and goals supporting energy efficiency in transportation designs, land use projects, and facilities. The project does not include any land uses or policies that would directly or indirectly result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. For example, the City strives for energy efficiency in transportation as it is the number one user of energy. Policy changes identified in the updated GP/LCP are VMT-reducing actions, which will increase the City's energy efficiency in accordance with Coastal Act 30523. Further, the CAP encourages installation of solar PV panels on new and redeveloped commercial development and City of Imperial Beach facilities. This would also help conserve energy resources. Therefore, no impact would occur related to this issue area.

b) The GP/LCP sets goals and policies for renewable energy and energy efficiency for the City of Imperial Beach and is in accordance with Coastal Act 30253(d), to minimize energy consumption and VMT. These include Land Use element Policy 2.2.2 Encourage land uses and improvements that reduce energy and water consumption, waste and noise generation, air quality impacts and support other comparable resource strategies for a sustainable Imperial Beach; Policy 4.1.7 Increase energy efficiency in existing buildings and outdoor lighting; and Policy 4.1.8 Increase use of renewable energy sources community-wide. The updated IP also requires that large new developments achieve Leadership in Energy and Environmental Design Green Building rating system certification or can demonstrate the ability to achieve certification.

The CAP reduction measures include increasing renewable electricity within the City. It encourages increased grid-supplied renewables and the increase in commercial solar PV. Policy E.1 in the CAP proposes to partner with neighboring jurisdictions to evaluate the potential to join a regional Community Choice Energy (CCE) program and increase the share of renewables of grid-supplied renewable power to 75% by 2030. The State of California does not currently have requirements for new non-residential commercial properties to have solar PV or other on-site renewable energy generation. However, the CAP encourages the placement of solar PV panels on all new or redevelopment commercial development as well as on public facilities. The CAP is consistent with the goals and policies set forth in the updated GP/LCP. Therefore, no impact would occur.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS				
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) 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 or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a.i) No earthquake fault zones, as delineated by the Alquist-Priolo Earthquake Fault Zoning Map, is located within the City of Imperial Beach (California Department of Conservation 2018). The Safety Element of the GP/LCP states that the La Nacion Fault is the closest to the City of Imperial Beach, located about 2 miles east. Thus, substantial adverse effects to people or structures due to fault rupture are not expected and no impact would occur.

a.ii) The entire Southern California region is subject to strong seismic ground shaking due to the numerous faults that traverse California. The Safety Element of the GP/LCP states that much of the City lies upon deposits that are poorly consolidated or unconsolidated aggregates of silt, sand, and gravel, resulting in a high potential of earthquake, and damage to structures located on this material. However, adherence to regulatory codes, such as Uniform Building Code (UBC) and California Building Code (CBC), would ensure that all new development that could occur consistent with the GP/LCP and CAP would be built to adequately withstand strong seismic ground shaking through proper engineering and design. This would limit the potential impact to less than significant.

a.iii) Strong seismic ground shaking could result in liquefaction of poorly consolidated and saturated soils. Liquefaction occurs when water-saturated sediments are subjected to extended periods of shaking. The Safety Element of the Imperial Beach GP states that due to the structure of the soils and the high-water table within the City of Imperial Beach, liquefaction poses the biggest threat of serious damage in the event of moderate or major seismic activity. However, adherence to regulatory codes, such as UBC and CBC, would ensure that all new development that could occur consistent with the GP/LCP and CAP would be built to adequately withstand liquefaction or ground failure associated with strong seismic ground shaking through proper engineering and design. This would limit the potential impact to less than significant.

a.iv) Because the terrain of Imperial Beach is generally flat, the potential for landslides to occur is low. There are, however, small cliffs within Border Field State Park and at the south end of Seacoast Drive (Safety Element 2018). Limited landslides may occur in these areas during an earthquake of sufficient magnitude. The project does not propose development or any changes to UBC and CBC standards. Future development in the City would continue to comply with applicable UBC and CBC standards, resulting in a less than significant impact as a result of the project.

b) Soil erosion or loss of topsoil would generally not occur with the proposed project as the City is mostly developed, no specific development is proposed, and no changes to policies resulting in increased erosion would occur. It is possible that unstable soil conditions may exist within the City and could cause related damage through lateral spreading, subsidence, liquefaction, or collapse. Continued adherence to the standards of the existing CBC and compliance with the National Pollutant Discharge Elimination System (NPDES) permit and Storm Water Pollution Prevention Plan (SWPPP) requirements, as well as implementation of best management practices, would limit impacts related to soil erosion to a level that is less than significant.

c) The GP/LCP includes policies that support joint use of parks and school sites; enhance public coastal access; implement Complete Streets; and support tourist-related commercial uses, including Bayfront visitor-commercial uses, relocation of the Public Works yard, improved pedestrian and bike facilities, an ecotourism recreation corridor, and sea level rise adaptation measures that could be located within an unstable geologic unit or unstable soil. The CAP also encourages commercial solar PV panels, and increased EV charging stations, tree planting, and resiliency construction actions. Any new development occurring within the City would continue to be designed and constructed to meet the most current seismic safety standards for liquefaction that are included in the CBC and standards established by the City of Imperial Beach. Therefore, this is a less than significant impact.

d) Like VII (c) above, expansive soils have the potential for shrinking and swelling with changes in moisture content, which can cause damage to overlying structures. Expansive soils are a common feature in Southern California. Unstable soil conditions can be controlled through proper engineering and adherence to required building standards, such as the UBC and CBC. Since no specific development project or changes to policies affecting the UBC and CBC are proposed, the project would result in a less than significant impact.

e) Sewer systems are currently used throughout the City of Imperial Beach. If new development were to occur due to the project, it would also be served by the sewer. The City of Imperial Beach is largely developed and not be appropriate for septic tanks or other waste water disposal systems. Therefore, there would be no impact.

f) Imperial Beach is underlain by the San Diego Formation, a tertiary shallow water marine deposit of Pliocene Age. An important feature of this formation is the fact that it is locally fossiliferous. The formation consists of chiefly dense, easily pulverized, silty, very finely bedded sandstones. The more recent Quaternary deposits include three general types of material. A narrow strip of beach deposits, whose deposition is mainly caused by ocean currents and wave action, is found along the entire coastline of Imperial Beach. The urbanized area of the City is almost entirely underlain by the Baypoint Formation, which consists of recent marine mud. The surface geology of the Tijuana River Estuary consists of alluvial material. This deposition was caused by the Tijuana River's erosive action upstream. The alluvial material consists of layers of sand and gravel, as well as larger stones. The San Diego and Baypoint Formations are considered to have high paleontological sensitivity. Although no development is proposed, policies proposed could indirectly result in ground disturbance activities. Future projects would be subject to project-level CEQA review to analyze impacts involving paleontological resources. This project-level CEQA review during the development and permit process would ensure a less than significant impact would occur as a result of the project.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS				
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a) The GP/LCP is a policy-level document and does not propose any development projects. However, policies associated with the project could result in future ground disturbance, construction, and development activities. Estimating the construction-related GHG emissions of these policies is not possible due to the variability and uncertainties related to the location and extent of future individual activities. The GP/LCP also includes policies that would encourage land uses and public and private improvements that reduce GHG emissions, such as increasing energy efficiency in existing buildings, increasing the use of renewable energy sources, promoting water efficiency, and increasing waste diversion Section 4.1 of the CAP (City of Imperial Beach, 2019a).

Similarly, the CAP establishes a roadmap for the City to meet GHG reduction targets and contains recommended strategies and measures for reducing emissions but does not propose or require development of individual land use projects that would otherwise not occur. The measures in the CAP are not anticipated to generate significant impacts since most measures would result in upgrades to existing uses, such as installation of solar PV systems, planting of new trees, and expansion of EV charging infrastructure. Therefore, it is anticipated that any construction-related emissions associated with the policies would be more than offset by the operational benefits of the measures in the CAP. Implementation of the strategies and measures proposed within the CAP would result in annual community-wide GHG emission reductions. It is estimated the CAP local measures would result in total emission reductions of 6,454 MT CO₂e, the amount necessary, when in combination with other state, federal, and regional efforts, to achieve the reduction targets the City has selected for 2020 and 2030. Thus, implementation of the GP/LCP and CAP would be less than significant.

The City estimated emissions reductions associated with implementation of the local CAP measures for the 2030 targets described in Chapter 4 of the CAP (City of Imperial Beach, 2019a).

Estimates of the CAP’s GHG reductions are based on empirical data that has been collected on existing, similar programs. Additional estimates of the effectiveness of reduction strategies are based on SANDAG’s forecast development activity, and participation rates, based on the success of similar, existing programs in comparable locations. The CAP uses reduction estimates for the 2030 CAP horizon year. As provided in CEQA Guidelines Section 15183.5(b)(1)(D), the CAP also provides clear performance standards for reduction measures to ensure their effectiveness.

The estimates involve data collection and analysis by experts in climate action planning, City programs that reduce GHG emissions, regional demographic and economic forecasting, and other relevant topics that include:

- Actual empirical data describing participation in programs (e.g., solar PV installations, EV charging station implementation); and
- Progress on implementation of City goals, plans, and/or strategic frameworks (e.g., Energy Roadmap, programmed active transportation projects).

T.1 Increase citywide electric vehicle charging stations

This measure estimates reductions based on increasing the quantity of EVs that have trips that begin, end, or take place entirely within the City. The measure estimates that 5% of all new commercial and multifamily parking spaces added by 2030 will have EV charging stations installed. The measure utilizes recent commercial space trends within the City and SANDAG estimates for new multifamily units through 2030 to estimate the total number of parking spaces that will be added for these land uses. It then applies a factor of 5% to arrive at the total number of new charging stations. A range of EV miles per charger per day and per year is then applied for both commercial and private EV charging stations based on empirical resources, such as the EMFAC2014 model to arrive at total EV miles per year and GHG emission reductions.

T.2 Clean municipal fleet

This measure estimates reductions based on gradual replacement of the municipal fleet with cleaner vehicles. An inventory of City vehicles and their fuel usage was utilized to estimate the annual miles driven and total emissions for each vehicle. A replacement schedule with plug-in hybrid EVs (PHEVs) and EVs was then assumed through 2030 and the correspondent reduction in emissions was then calculated. Due to the relatively small size of the City and resulting short trip length, it is assumed that gasoline use will be completely offset by the replacement of each vehicle, even in the case of the PHEVs.

T.3 Increase mass transit ridership

This measure estimates reductions based on increased transit ridership from a new transit line and the use of electric buses. New ridership numbers, VMT reductions, and emissions from electric buses are based on the San Diego Metropolitan Transit System grant application to the Transit and Intercity Rail Capital Program (TIRCP), which requires a rigorous methodology demonstrating emissions reductions.

T.4 Improve pedestrian and bicycle facilities

This measure estimates reductions based on an increase in biking and walking commuting from new and improved facilities that are planned for construction and completion through 2030. New facilities are assumed to increase the amount of people biking and walking to work within the City and replacing vehicle trips and the correspondent average vehicle emissions factor within San Diego County.

T.5 Reduce municipal employee vehicle miles traveled (VMT)

This measure estimates reductions based on City employees replacing a portion of vehicle trips, and the associated VMT, with electric bicycles during their workdays. The average vehicle emissions factor is applied to the avoided VMT to estimate the emission reductions.

E.1 Increase grid-supply of renewable and zero carbon electricity

This measure estimates reductions from the additional 15% of grid-supplied renewable power by 2030 that would result from CCE or alternative program. These reductions are above the 60% state Renewable Power Standard (RPS) mandate for 2030. It is assumed that the program would supply 80% of the local electricity load and consist of 75% renewable energy by 2030, and that SDG&E would only meet the 60% RPS mandate.

E.2 Increase commercial behind-the-meter photovoltaic (PV) systems

This measure estimates reductions from the installation of solar PV on new and redeveloped commercial facilities between 2020 and 2030. The measure assumes a quantity of renewable energy that is generated by the new installations will replace grid-supplied energy and its associated GHG emission factor for the City. The quantity of solar to be installed is based on recent additions of new commercial space within the City and assumes that similar quantities will be delivered through 2030.

W.1 Divert waste from landfill

This measure estimates reductions from increasing waste diversion rates from Business-as-Usual rates, 58% in 2016 to 80% in 2030. It is also assumed that landfills will increase their landfill gas capture rates from Business-as-Usual rates, 75% currently to 90% in 2030. These variables are combined to calculate the reductions. The City will continue to work with EDCO to achieve the 80% diversion rate.

S.1 Urban tree planting

This measure estimates carbon sequestration from requiring planting of trees at all new and redeveloped commercial and multifamily developments, one tree per three commercial parking spaces and one per multifamily unit. The quantity of new multifamily units is based on SANDAG Series 13 Forecast estimates of new units in the City between 2025 and 2030. New commercial space is based on the average annual number of commercial parking spaces added in the most recent 3 years and projected forward between 2025 and 2030. The City also commits to 300 trees within its own rights-of-way. An average sequestration factor per tree is then assumed to estimate total sequestered emissions through 2030.

The CAP's overall 2030 reduction target is consistent with the California's longer-term goals expressed in SB 32 for 2030. Imperial Beach's 2050 target demonstrates the City's commitment to California's long-term GHG goal expressed under Executive Order S-3-05. SB 32 calls for a statewide reduction in GHG emissions to 40% below 1990 levels by 2030. Executive Order S-3-05 calls for a reduction to 80% below 1990 levels by 2050. These four sets of guidance for the state government—AB 32, Executive Order B-30-15, SB 32, and Executive Order S-3-05— although they do not directly create any obligation for local governments, represent the framework for CEQA analysis of GHG emissions impacts in California. For development projects and plans, it is important to evaluate whether a subject project

“incorporates efficiency and conservation measures sufficient to contribute its portion of the overall greenhouse gas reductions necessary” for California to achieve its own mandates (Center for Biological Diversity, et al. v. California Department of Fish and Wildlife, the Newhall Land and Farming Company, California Supreme Court, Case No. 5217763). If a project or plan demonstrates that the rate of GHG emissions is efficient enough to provide its share of AB 32, Executive Order B-30-15 (and the same goal expressed in SB 32), and Executive Order S-3-05 emissions reductions, the impact is not cumulatively considerable (Center for Biological Diversity, et al. v. California Department of Fish and Wildlife, page 12; Crockett 2011).

b) In December 2008, the California Air Resources Board (ARB) adopted the Climate Change Scoping Plan (Scoping Plan), which contains the main strategies California will implement to achieve the required GHG reductions required by AB 32 (ARB 2008). AB 32 requires statewide GHG emissions to be reduced to 1990 levels by 2020. ARB is required to update the Scoping Plan at least once every 5 years to evaluate progress and develop future inventories that may guide this process. ARB approved the first update to the Scoping Plan, first update to the Climate Change Scoping Plan: Building on the Framework, in June 2014 (ARB 2014).

In response to SB 32 and the companion legislation of AB 197, ARB approved the Final Proposed 2017 Scoping Plan update: The Strategy for Achieving California’s 2030 GHG Target in November 2017 (ARB 2017). SB 32 sets a statewide GHG emission reduction target of 40% below 1990 levels. The 2017 Scoping Plan draws from the previous plans to present strategies to reaching California’s 2030 GHG reduction target. The Scoping Plan update also recognizes that local actions are critical for implementation of California’s GHG reduction goals. The Scoping Plan update encourages local governments to develop policy direction that applies broadly to the community within the GP or CAP to promote the development of renewable, zero emission, and low carbon technologies. The Scoping Plan update also encourages local governments to adopt a reduction goal for municipal operations emissions and move toward establishing similar goals for community emissions that parallel the state commitment to reduce GHG emissions.

Through its GP/LCP, the City is providing the policy framework for GHG reduction measures detailed in the CAP. Consistent with the Scoping Plan recommendations for local agencies, Policy 4.1.1 of the GP/LCP calls for adoption and implementation of a CAP that is aligned with state requirements for GHG emission reductions. In addition, the GP/LCP include policies aimed at reducing GHG emissions through increased energy efficiency, renewable energy sources, water efficiency, solid waste diversion, and mobility system improvements.

Although not mandated by AB 32, SB 32, and the Scoping Plan updates, the CAP targets emission reductions below 2012 levels of 4% by 2020 and 42% by 2030, consistent with state guidance in support of state efforts under AB 32 and SB 32. In addition, the CAP also includes projected emission reduction benefits associated with state programs. Without any local actions the City of Imperial Beach would meet and exceed its 2020 reduction target of 4% below 2012 levels. This is because other state, federal, and regional efforts are expected to account for the bulk of reductions. To meet the local 2030 target of 42% below 2012 levels, the CAP would achieve reductions of approximately 6,454 MT of CO₂e. The CAP measures are designed to achieve these reductions, which would be consistent with Scoping Plan recommendations.

The CAP also serves to align the City’s reduction efforts with Executive Order S-3-05, which sets a goal of reducing statewide emissions by 80% by 2050. However, Executive Order S-3-05 has not been

codified as state law and remains a goal rather than a target. Thus, estimating the reduction potential from federal, statewide, and local actions through 2050 is highly speculative due to several variables that cannot reliably be assessed such as technological improvements, changing market dynamics, population growth, and other demographic changes. Additionally, state GHG reduction actions and strategies are expected to continue to evolve substantially. The current Scoping Plan update, for example, only provides an outline for actions through 2030. As the 2030 target year approaches, California is expected to prepare additional Scoping Plan updates that outline actions beyond 2030. Also, it is likely that additional legislation will be passed that would have additional impacts on emissions through 2050. As a result, GP/LCP (Policy 4.1.2) ensures that the CAP has a process for evaluation and monitoring progress. Regular monitoring and implementation reports will include updated inventories and projections, assessment of the effectiveness of the individual measures, and eventually development of forecasts, measures, and targets beyond 2030.

In summary, the GP/LCP would provide the policy framework for GHG reduction measures detailed in the CAP and the CAP targets emission reductions for the City, consistent with state efforts under AB 32 and SB 32. In addition, the City will continue to evaluate and monitor the CAP by updating the inventories and projections and assessing the effectiveness of the individual measures. Therefore, the CAP and the GP/LCP would not conflict with any plans adopted for the purpose of reducing GHG emissions and this impact is less than significant.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS				
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) 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 create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a) The project would not result in the increased routine transport, use, or disposal of hazardous materials. It is possible that future construction activities would require use of materials that include on-site fueling/servicing of construction equipment, and the transport of fuel, lubricating fluids, and solvents. These types of materials are not acutely hazardous, and all storage, handling, and disposal of these materials are regulated by the California Department of Toxic Substances Control (DTSC), U.S. Environmental Protection Agency (EPA), and the Occupational Safety & Health Administration. The project would not increase heavy industrial uses or other types of facilities that would generate substantial hazardous material risks. Therefore, a less than significant impact would occur.

b) As described in IX (a) above, all hazardous materials handling, transport, use, or disposal is regulated through state and federal laws. Increased potential for significant public or environmental hazards due to release of hazardous materials would not result from the project. Therefore, the project impact would be less than significant.

c) Seven schools provide education within the City of Imperial Beach to grades kindergarten through 12th grade. Policies 5.15-5.1.6, 5.1.9, 5.2.6-5.2.7 support shared use of schools for park and recreational

purposes. Shared use of schools for park and recreational purposes does not include specific construction or development projects that would involve the handling of hazardous or acutely hazardous materials. Compliance with regulatory requirements, such as environmental site assessments and health risk assessments, would ensure construction and operation impacts within one-quarter mile of an existing or proposed school are less than significant if such development were to occur.

d) According to the DTSC and the State Water Resources Control Board, hazard materials sites are located throughout the City. Although the project does not propose development or increase the intensity of uses within the City, hazardous material sites could continue to be encountered during implementation of the GP/LCP and the measures in the CAP. In the absence of specific information regarding the location and wide range of construction and development projects, uniformly applied procedures established by the County Department of Environmental Health that are related to the identification and remediation of soil contamination would avoid any public health impacts associated with potential soil contamination by previous activities on development sites. Continued adherence to applicable City, state, and/or federal regulations regarding remediation of hazardous materials sites on a case-by-case basis will ensure that impacts related to the project are less than significant.

e) The Naval Outlying Landing Field, locally referred to as Ream Field is located within the City of Imperial Beach and is a U.S. Government Naval installation that is a part of Naval Base Coronado. The facility is used primarily for helicopter operations and helicopter pilot training. The Naval Outlying Landing Field Imperial Beach Airport Land Use Compatibility Plan was adapted in 2015 (SDCRAA 2015). The City is located in the Airport Influence Area, which mandates that local agencies must submit an application for consistency determination to the Airport Land Use Commission for proposed land use changes. No land use or building height changes are proposed near the facility that would result in a safety hazard for people residing or working in the project area. Therefore, there would be no impact.

f) The City currently has an Emergency Operations Plan. Future construction and development activities that may indirectly occur as a result of the project, such as implementation of Complete Streets policies, will be performed consistent with City engineering and fire safety standards, and are not expected to physically interfere with the Emergency Operations Plan. The CAP will also contribute to increased safety and resiliency of the City through its adaptation measures and monitoring program. Therefore, there would be no impact.

g) Although Imperial Beach is an urbanized community and is not considered at high risk for wildland-urban interface fires, the catastrophic fires that swept through California in 2017 and 2018 demonstrated that even areas of low fire hazard risk can experience extreme fire events. The GP/LCP and CAP are policy-level documents that do not contain specific projects. However, if construction and development activities were to occur at the Wildland-urban interface, the proximity of natural vegetation to urban uses would increase the potential for wildland fire impacts. Proposed new 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 limiting potential wildland fire impacts to a level that is less than significant.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY				
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would; result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) 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; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a) The GP/LCP and CAP propose policies and measures that would not directly violate water quality standards or waste discharge requirements. The GP/LCP and CAP are also policy-level documents that do not contain specific construction or development projects but do contain policies such as Complete Streets implementation, joint use of school facilities, and beach access and resiliency measures that when implemented could potentially result in increased runoff potential.

Future development would continue to be subject to the City's environmental review process. Although development consistent with the GP/LCP and CAP could result in construction-related wastewater discharge into the local sewer system, the City's Jurisdictional Urban Runoff Management Program (JURMP) and Municipal Code Chapter 8.30: Urban Runoff Management and Discharge Control, require best management practices (BMPs) to reduce the potential for polluted runoff during construction and operation of new development. The JURMP and Municipal Code Chapter 8.30 would avoid any substantial adverse indirect effects on nearby habitat associated with the Tijuana River Estuary or ocean shoreline.

In addition, under Section 402 of the Clean Water Act, the Regional Water Quality Board (RWQCB) issues NPDES permits to regulate waste discharges to "Waters of the United States" (WOTUS). The

U.S. EPA sets the definition of WOTUS under the Clean Water Act. Any construction project resulting in the disturbance of 1 or more acres requires an NPDES ground construction permit. Construction project proponents are required to prepare a SWPPP.

Furthermore, the GP/LCP proposes measures to collaborate with the San Diego Regional Municipal Separate Storm Sewer System (MS4) Storm Water Permit Copermittees to implement Water Quality improvement Plans for the San Diego Bay, Tijuana River, and Otay River watershed management areas.

Additionally, the GP/LCP proposes the following measures, which would reduce the amount of polluted runoff; require the planting of trees through the development permit process as mitigation for stormwater runoff (Policy 4.2.2), and reduce the amount of impervious surfaces (Policy 4.4.5). The CAP includes goals to reduce the amount of vehicles on the road by improving mass transit and increasing ridership. Improving mass transit and increasing ridership would reduce the amount of vehicles on the road, which could result in a decrease in use of facilities such as gas stations, which generate polluted non-point source runoff.

Therefore, development would continue to be evaluated on a project-specific basis for potential violation of water quality standards or waste discharge requirements. Implementation of required BMPs would ensure that any potential impacts related to water quality and/or waste discharge would be limited to a level that is less than significant.

b) Due to the presence of the estuary and lands that are periodically inundated, the groundwater level in the City is less than 25 feet in Urban Areas and as close as 8 feet to the surface at Ninth Street and Imperial Beach Boulevard. However, Imperial Beach is not dependent on groundwater supplies. The water supply would continue to be supplied by the imported water system and not local groundwater. The GP/LCP and CAP proposes measures that may increase the water demand for landscaping, such as improving the existing tree canopy through additional tree planting (Policy 4.2.2) (Strategy S.1), as well as general improvements to pedestrian, bicycle, and transit connectivity, which could increase the amount of landscaping. However, the use of water for landscaping would not be groundwater and would comply with applicable water-efficient landscape standards within the City of Imperial Beach Municipal Code. Additionally, the GP/LCP includes policies to use drought-tolerant plants to the extent feasible in civic landscaping (Policy 4.2.4d). The project would not substantially decrease groundwater supplies, interfere with groundwater recharge and/or impede sustainable groundwater management of the basin. The impact would be less than significant.

c) The GP/LCP and CAP propose measures, such as developing "Complete Streets" (Policy 3.1.1), improving the bike and pedestrian network (Strategy T.4), and creating street frontages (Policy 8.3.4), which could alter existing drainage patterns and potentially increase impervious surfaces. However, these projects would primarily include replacing and retrofitting existing structures, which would not alter existing drainage patterns or substantially increase impervious surfaces. The CAP also includes measures to increase commercial solar PV (Measure E.2); however, these impervious surfaces would be installed on redeveloped and commercial development and would not increase the existing impervious surface footprint.

- i) Future development would largely occur within existing rights-of-way where drainage patterns already exist and would not result in substantial erosion or siltation on- or off-site. The GP/LCP also requires that new developments provide adequate drainage and erosion control facilities

that convey site drainage in a non-erosive manner to minimize hazards resulting from increased runoff and erosion (Policy 7.1.24). Additionally, the GP/LCP requires that impervious surfaces are minimized in areas of new development and redevelopment and, where feasible, slow runoff and maximize on-site infiltration of runoff (Policy 8.3.8a). The measures and strategies throughout the CAP generally would occur within existing developed areas where drainage patterns already exist. Therefore, improvements and development consistent with the GP/LCP and CAP would not substantially alter existing drainage patterns causing substantial erosion or siltation on- or off-site. The impact would be less than significant.

- ii) The risk of flooding due to surface runoff and coastal flooding is increasing due to sea level rise and climate change. The GP/LCP and CAP are policy-level documents, and do not include any project-specific designs or proposals that could directly result in increased runoff or flooding. However, they do include policies and implementation measures that could indirectly result in future construction and development activity. The GP/LCP proposes measures to prevent flooding, such as raising existing infrastructure and structures, and the adaptation of stormwater and wastewater systems (Policy 7.1.4a). These changes would primarily occur within existing developed areas. As stated above, the GP/LCP and CAP propose measures that could alter existing drainage patterns; however, the projects would largely occur where drainage patterns already exist and would not result in substantial flooding on- or off-site. Additionally, the GP/LCP requires that impervious surfaces are minimized in areas of new development and redevelopment and, where feasible, slow runoff and maximize on-site infiltration of runoff (Policy 8.3.8a). Therefore, future improvements and development consistent with the GP/LCP and CAP would not substantially alter existing drainage patterns or increase the rate of surface runoff in a manner that would result in flooding on- or off-site. The impact would be less than significant.
- iii) As stated above, the GP/LCP and CAP propose measures for new development and/or redevelopment that could increase the amount of runoff water; the GP/LCP and CAP also propose measures that are intended to reduce runoff. Although implementation of the GP/LCP and CAP could result in construction-related wastewater discharge into the local sewer system, projects would have to comply with the runoff requirement in the City's JURMP, Municipal Code Chapter 8.30, and the proposed Water Quality Improvement Plans. Future development would be evaluated on a project-specific basis for potential violation of polluted runoff. With the proposed GP/LCP and CAP measures to reduce runoff and the measures currently in place, improvements and development consistent with the LCP/IP/CAP would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. The impact would be less than significant.

d) According to the California Department of Conservation, "a Tsunami is a wave, or series of waves, generated by an earthquake, landslide, volcanic eruption, or even large meteor hitting the ocean." Tsunamis represent a threat to Imperial Beach due to the City's low-lying geography. While the possibility of a major tsunami from a volcanic eruption, landslide, and/or large meteor is extremely unlikely, a tsunami caused by an earthquake is considered possible. Specifically, the Rose Canyon Fault has potential to cause a magnitude 6.9 earthquake, which could trigger a near-shore tsunami along the coastline of the City. Evacuation signs have been posted within areas of the City that could be impacted by a tsunami. Policies 7.3.1–7.4.10 address safety measures put into place to increase safety against natural disasters. As the GP/LCP and CAP are policy documents and do not propose specific

development, future development would be subject to project-level CEQA review to analyze impacts involving risks associated with inundation by seiche, tsunami, or mudflow. However, resiliency measures and monitoring requirements implemented in the GP/LCP and encouraged in the CAP could potentially have a benefit with decreasing the risk to seiche, tsunami, or mudflow. Therefore, the impact would be less than significant.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING				
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a) No development or infrastructure improvement or policy change is proposed that could divide an established community. The project does propose a land use change on the parcel shown in Figure L-1, which would be changed from Urban Reserve to Open Space. This parcel is located on the northern edge of the city and currently has no development on the parcel. The Open Space designation would not result in development of the parcel.

Implementation of the CAP and its measures would enhance pedestrian, bicycle, and transit connectivity and encourage solar PV panels be placed on new or redeveloped commercial, as well as public facilities. Implementation of the CAP intends to increase connectivity throughout the City by implementing both external and internal design guidelines for bike, pedestrian, and transit connectivity, which would connect existing residential development to nearby sidewalks and bus stops. Therefore, no impact associated with dividing the community will occur.

b) The Imperial Beach GP/LCP is the City's constitution for physical development and change within the City. The GP is a legal mandate that governs both private and public actions. This 2019 GP/LCP update replaces a plan that was adopted by the City in 1994. Since then, climate change and resiliency, environmental justice, housing, sustainability, community health, economic prosperity, multi-modal mobility, and sea level rise issues have become issues of concern at the state and regional government levels. The updated plan addresses these and other issues in a manner that makes sense for Imperial Beach and furthers local goals. Updating of the GP/LCP includes policy updates that are consistent with the broader goals of the City of Imperial Beach and are in accordance with the California Coastal Act as described in detail in Attachment 2. Further, the project does not weaken any existing policies, plans, or regulations intended for the purpose of avoiding or mitigating an environmental effect. Therefore, there would be a less than significant impact.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES				
Would the project:				
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"/>	<input checked="" type="checkbox"/>
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"/>	<input checked="" type="checkbox"/>

Comments:

a) No portion of the City is delineated as a mineral resource or mineral resource recovery site in the GP/LCP or other applicable planning document or land use plan. According to SANDAG geographic information system data, a small portion located in the southeast corner of the City is identified as a Mineral Resource Zone (MRZ)-2. MRZ-2 is defined as areas underlain by mineral deposits where geologic data show that significant measured or indicated resources are present (County of San Diego 2008). No land use changes are proposed on the MRZ-2 identified areas in the City of Imperial Beach. The north end of the City near the salt marsh is identified as MRZ-1. MRZ-1 is defined as areas where adequate geologic information indicates that no significant mineral deposits are present. This area is currently undeveloped, and no development of the area is proposed under the project. The rest of the City is defined as an MRZ-3 area. An MRZ-3 area contains mineral deposits, the significance of which cannot be evaluated from available data. Due to limited resources available and the urban nature of the City, no impact would occur.

b) See XII (a), above.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
XIII. NOISE Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project 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 checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a) The Noise Element was not included in the GP/LCP update and is included under a separate cover. There are no changes to the Noise Element from the 2015 GP/LCP for the City of Imperial Beach. While the LCP/GP, IP, and CAP are policy-level documents and do not directly recommend any measures that would generate excessive amounts of construction noise, indirect construction activity associated with implementation of the GP/LCP and CAP measures could possibly result in temporary increases in noise levels. All construction activities would continue to be required to comply with the City’s noise ordinance and undergo project-level CEQA review to analyze impacts related to noise when more specific project details are known. Such compliance would reduce noise levels associated with construction activities. This impact would be less than significant.

b) Similar to Section XIII (a), temporary construction activities as a result of implementation of the GP/LCP and CAP could result in excessive groundborne vibration or groundborne noise. In addition, the GP/LCP and CAP are policy-based documents and do not directly recommend any measures or land use development that would generate excessive amounts of construction noise. A majority of the measures would involve small-scale construction projects, such as energy-efficient retrofits and streetlight replacement. The exact nature of future construction that could occur is not known at this time; thus, construction noise levels cannot be estimated. However, all construction activities would be required to comply with the City’s noise ordinance and discretionary projects would undergo project-level CEQA review to analyze impacts related to noise when more specific project details are known. Such compliance would reduce noise groundborne vibration and noise levels associated with construction activities. This impact would be less than significant.

c) The Naval Outlying Landing Field Imperial Beach Airport Land Use Compatibility Plan was adopted in 2015 (SDCRAA 2015). There is no updated Noise Element in the updated GP/LCP, however, policy 2.6.7 in the GP/LCP update requires residential units constructed in the 60dB noise contour of Ream field to attenuate exterior noise levels down so that interior noise levels are at 45dB. Additionally, there are updated policies in the IP regarding Ream Field. In the updated IP Policy L-5 Section 2.6, edits were made to emphasize City’s support for military operations at Ream Field, rather than encouraging closure. New policies were added to encourage coordination, pursue shared use public facilities, and to maintain compatible noise and safety contours. The CAP does not propose any reduction measures that would expose people residing or working in the project area to excessive noise levels. Therefore, a less than significant impact would occur with this issue area.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
XIV. POPULATION Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

a) According to the population and housing data from SANDAG, the City of Imperial Beach has an estimated population of 26,324 persons. The SANDAG projected regional growth forecast estimates a population of about 36,125 persons in 2050. The City of Imperial Beach is largely built out and urbanized. The CAP proposes measures that seek to reduce GHG emission by encouraging enhancement of pedestrian, bicycle, and transit connectivity, through the adoption of zoning ordinances and design guidelines in the updated GP/LCP and IP. There are no changes to the physical street system or street classifications proposed. While the City of Imperial Beach is largely built out and there are not large amounts of vacant land, mixed use infill development and new housing are anticipated via existing zoning that will increase population growth consistent with anticipated projections. This impact would be less than significant.

b) See Section XIV (a). The Housing Element was not included in the updated GP/LCP and is provided under a separate cover. Policies 1.1–5.5 in the Housing Element address housing goals and needs for the City of Imperial Beach. Policy 1.1 states the City will accommodate a variety of housing types to meet the needs of all residents. The project does not include any specific development, infrastructure project, or policies that would directly or indirectly displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, no impact would occur.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES				
a) 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) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a.i) Fire protection and emergency medical services are provided by the City of Imperial Beach Fire Department located in the Civic Center complex. The Fire Department operates one engine daily and houses a reserve engine at the fire station. While the GP/LCP and CAP would not directly introduce new structures, future infill development and redevelopment could continue to occur consistent with the policy updates. The City estimates fire protection needs based on growth as projected in the City's LCP/GP, and new development and service levels anticipated would be consistent with existing projections. The impact would be less than significant.

a.ii) Similar to the evaluation under Section XV (a.i), the possible increase in population that may occur as a result of implementation of the GP/LCP and CAP would not increase the demand for police protection service to the extent that new police protection facilities would be required. The demand for law enforcement services in Imperial Beach is determined not only by the needs of residents but also by visitors to the City, particularly the beach area. The San Diego County Sheriff's Department provides contract law enforcement services to the City of Imperial Beach. Based out of the Imperial Beach Station at the Civic Center Complex, the Sheriff's Department personnel provide all aspects of law enforcement services, including patrol, traffic, crime prevention and investigations, and Community Oriented Policing and Problem Solving (COPPS) to the City's residents, businesses, and visitors. The updated GP/LCP provides updated information on crime rates in Imperial Beach. The impact would be less than significant.

a.iii) Similar to the evaluation under Section XV (a.i) and (a.ii), the possible increase in population that may occur as a result of implementation of the GP/LCP and CAP would be small and would not increase the demand for new schools over current levels or anticipated projections. The impact would be less than significant.

a.iv) The City of Imperial Beach owns and maintains approximately 14.74 acres of park land in four sites, including sports park, Ream Park, Triangle Park, and Marino Vista Park. The adoption of the CAP and implementation of the updated GP/LCP would not cause the construction of new parks that would have substantial adverse physical impacts. Similar to the evaluation under Section XV (a.i), (a.ii), and (a.iii), the possible increase in population that may occur as a result of implementation of the GP/LCP and CAP would be small and would not increase the demand for new parks over current levels or anticipated projections. Therefore, less than significant impacts would occur.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
XVI. RECREATION				
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"/>	<input checked="" type="checkbox"/>	<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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

a) No new increased population is associated with the adoption of the updated GP/LCP and CAP that would result in increased use and physical deterioration of recreational facilities. The GP/LCP and CAP measures promote the expansion of the current network of bicycle and pedestrian paths, which would provide additional passive recreational facilities within the City and could potentially lessen wear on existing facilities.

The Parks, Recreation, and Coastal Access Element was updated in the GP/LCP. More specifically, Policies P-1 through P-16 were updated to:

- Recognize that Imperial Beach’s coastline, ocean, parks and open space preserves define its character, contribute to a healthy environment, and support the economy.
- Serve the public with parks, coastal access and amenities, and recognize the role of parks in healthy communities.
- Emphasize the importance of joint use and coordination with other government agencies to meet current and future park and recreation needs.
- Identify coastal access opportunities, in accordance with the Coastal Act.
- Include new strategies to addresses sea level rise access impacts and improve resiliency of public spaces.

Therefore, the project would have a less than significant impact on parks and recreation facilities.

b) As discussed in Section XVI (a), adoption of the GP/LCP and CAP would not result in direct population growth or the construction or expansion of recreational facilities that could have an adverse physical effect on the environment. Although policy language has been updated in the GP/LCP regarding the use of joint use recreational facilities in the City, the project does not propose construction or expansion of any specific recreational facilities. Therefore, no physical impacts would occur.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION				
Would the project:				
a) Conflict with program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a) The City of Imperial Beach works through SANDAG to chart the City’s future growth and transportation investments through development and adoption of an RTP. The most recent RTP was incorporated into San Diego Forward, The Regional Plan, adopted by the SANDAG Board in 2015. The RTP is updated every 4 years. Although no physical changes to the street system or street classifications are proposed, this mobility element update was intended to bring the GP/LCP into conformance with regional goals for transit, roadway, bicycle, and pedestrian facilities.

The Mobility Element has been updated and establishes the framework for the City’s approach to Complete Streets, regional access, and the increased use of active transportation to reduce air pollution and GHG emissions while improving health. The element:

- Includes goals, policies, and a Street Typology System for “Complete Streets” where the needs of pedestrians, cyclists, and transit users as well as vehicles are addressed, and VMT and GHG emissions are reduced.
- Advances active living policies that complement the Land Use Element’s sustainability and healthy community policies.
- Recognizes and supports the growing role of innovative technology in meeting current and future mobility needs.
- Supports continued collaboration with SANDAG and other agencies to help plan for, operate, and monitor the performance of Imperial Beach’s mobility network.
- Strives for the provision of a reasonable amount of parking, where and when it is needed to serve residents, businesses, and visitors.

Policy changes improve consistency with relevant regional policies and do not create any conflicts with multi-modal policies. Therefore, this impact would be less than significant.

b) CEQA Section 15064.3 establishes guidelines evaluating project’s transportation impacts for VMT. VMT refers to the amount and distance of automobile travel attributable to the project. The City has a longstanding policy that arterials and local streets should be designed to operate at service level "C" or better during average daily traffic volume (ADT) conditions, and that signalized intersections under peak hour conditions should operate at service level "D" or better. The City acknowledges that a lower standard is acceptable for special events and seasonal beach-related traffic. However, the City

anticipates transitioning from a level of service to a VMT metric as the primary means to determine transportation impacts, in accordance with SB 743. The deletion of the level of service from the GP/LCP and the change to VMT do not conflict with state guidelines; therefore, no impact would occur.

c) The updating of the GP/LCP and implementation of the CAP encourages uses of a Complete Streets program. Complete Streets are implemented through improvements of, but not limited to, new or widened sidewalks, high visibility crosswalks, curb extensions, pedestrian countdown signal heads, traffic calming features, bicycle facilities, bicycle racks, lighting, signage, accessible public transit stops, access to schools, civic facilities, commercial/retail areas, and mixed-use land uses. None of the mobility element improvements in the GP/LCP proposed would introduce new safety hazards or incompatible uses at intersections or along roadway segments, as most would be designed to improve safe circulation and access for biking and walking. Proposed measures are aimed at providing alternative modes of transportation and reducing the amount of MT throughout the City. In fact, the CAP promotes implementation of the Safe Routes for multi-modal transportation and design guidelines to enhance bike, pedestrian, and transit connectivity, which would provide greater safety. Update of Code Section 19.27.020 Permitted Uses requires provisions of wider sidewalks and public space along major roadways and pedestrian facilities. The CAP does not include any measures that would substantially increase hazards due to a design feature or incompatible uses. Therefore, the impact would be less than significant.

d) The GP/LCP and the CAP propose and implement measures including Complete Streets policies that would increase safety for drivers, pedestrians, and bicyclists and seeks to reduce the number of automobiles on Imperial Beach streets, both of which may make access for emergency vehicles easier and more efficient. Future adjustments to City streets would continue to be reviewed by the Fire Department to ensure adequate access and turning radii are provided. The impact would be less than significant.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
<p>XVIII. TRIBAL CULTURAL RESOURCES Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p>				
<p>a). Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resource Code section 5020.1(k), or</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>b.) A resources determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a) As stated in Sections V (a) & (b) a review of historical and archaeological records was completed for the GP/LCP update and no significant archaeological or historical sites were identified within the City of Imperial Beach. However, the GP/LCP has added policies that expand joint use of parks and school sites, enhance public coastal access, Complete Streets implementation, Ecotourism recreation corridor, expansion of Bayfront visitor-commercial uses, relocation of the Public Works yard, multi-use development, and sea level rise adaptation that could potentially impact unknown historical resources. The CAP as well encourages tree planting and resiliency construction actions. A case-by-case environmental review of future development would be necessary to ensure consistency with SB 18 and AB 52. The GP/LCP specifically includes updated Policies 4.6.1 and 4.6.2 regarding compliance with protocols and maintaining confidentiality of archaeological sites in compliance with SB 18 and AB 52. The City of Imperial Beach complied with notification and consultation requirements of SB 18 and once the project was initiated complied with notification and consultation requirement of AB 52. Adherence to applicable City, county, state, and federal standards and guidelines related to the protection/preservation of historical resources, as well as the requirements mandated in the environmental review of individual projects would limit the potential for impacts related to historical resources to a less than significant level.

b) AB 52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation, prior to determining whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. The City of Imperial Beach initiated consultation with the Kumeyaay nation and their designated tribal

representative for their participation in the GP/LCP update, and requested information regarding tribal cultural resources within the City. To date, no response has been received indicating tribal cultural resources affected by the project. Adherence to applicable City, county, state, and federal standards and guidelines related to the protection/preservation of tribal cultural resources, as well as the requirements mandated in the environmental review of individual projects would limit the potential for impacts related to tribal cultural resources to a less than significant level.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS				
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) 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"/>
d) Generate solid waste in excess of State or local standards, or excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a) The GP/LCP and CAP are policy documents that do not propose any specific development, relocation, or construction activities that would cause utility impacts. The Imperial Beach Sewer Division is responsible for the operation, maintenance, and rehabilitation of the City’s 11 pump stations and 50 miles of sewer collection system, which convey the City’s wastewater to the City of San Diego Metropolitan Sewage system for treatment. The City of Imperial Beach requires NPDES permits, according to federal regulations for discharges to surface WOTUS. For point sources such as sewer pipes, the NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge. Any new development in the City would continue to comply with all provisions of the NPDES program. Therefore, implementation of the CAP would not exceed wastewater treatment requirements. The impact would be less than significant.

b) The city’s water supply is provided by the California- American Water Company, or CalAm. Drinking water systems are regulated by the SWRCB, Division of Drinking Water. . The GP/LCP and CAP are policy documents that do not propose any specific development or provide for increased density or intensity of uses. The CAP encourages the planting of 866 trees throughout the City of Imperial Beach. However, the use of water for landscaping would comply with applicable water-efficient landscape standards within the City of Imperial Beach Municipal Code. Additionally, the GP/LCP includes policies to use drought-tolerant plants to the extent feasible in civic landscaping (Policy 4.2.4d). Therefore, no substantial new demand for water supplies would occur. Future development would continue to require a case-by-case review to ensure adequate supplies are available. Therefore, a less than significant impact would occur.

c) See XIX (b), above. The population of Imperial Beach will steadily increase over time consistent with existing plans and zoning. Policy 6.7.1 in the updated GP/LCP states that the City of Imperial Beach will develop whatever agreements are necessary with the San Diego Area Wastewater Management District to provide sewer treatment capacity to accommodate the GP's projected growth. Future development would continue to be subject to the City's environmental review process. Although development consistent with the GP/LCP and CAP could result in construction-related wastewater discharge into the local sewer system, the City's JURMP and Municipal Code Chapter 8.30: Urban Runoff Management and Discharge Control, require BMPs to reduce the potential for polluted runoff during construction and operation of new development. The JURMP and Municipal Code Chapter 8.30 would avoid any substantial adverse indirect effects on nearby habitat associated with the Tijuana River Estuary or ocean shoreline. Therefore, a less than significant impact would occur.

d) Solid waste and recycling collection and disposal services for Imperial Beach are currently provided through an exclusive City franchise agreement with EDCO. The Otay Landfill Solid Waste Facility that is utilized by EDCO has an estimated remaining capacity of 33,070,879 cubic yards and an estimated closure date of April 2021 (CalRecycle 2011). The City of Imperial Beach has already instituted the separation of yard clippings from the remainder of the trash and the recycling of aluminum cans, tin cans, glass bottles, newspapers, and two types of plastic. In addition, this element includes policies to support composting, which would encourage further diversion of solid waste from the landfill. A reduction measure identified in the CAP requires the adoption of a "Zero Waste" policy to be achieved by 2050 and collaboration with the City's waste service provider to achieve statewide waste diversions targets. In 2011, AB 341 was adopted establishing a policy goal that 75% of statewide solid waste should be reduced, recycled, or composted by 2020. This is an expansion of previous state goals to divert 50% of community-wide waste. This measure is in compliance with state goals of waste reduction. Section 6.6 in the GP/LCP has been updated to support the CAP on maintaining existing policy and adds policy addressing composting. The GP/LCP and CAP are policy documents that do not propose any specific development that would generate solid waste in excess of state or local standards. Therefore, a less than significant impact would occur.

e) See XIX (d), above.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
XX. WILDFIRES If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a) The City of Imperial Beach does not have an adopted emergency response plan or evacuation plan. The Public Safety Department offers a CERT (Community Emergency Response Team) program so community members can gain needed training in the event of a large disaster. This program educates people about disaster preparedness for hazards that may impact their area and trains them in basic disaster response skills, such as fire safety, light search and rescue, team organization, and disaster medical operations. Using the training learned in the classroom and during exercises, CERT members can assist others in their neighborhood or workplace following an event when professional responders are not immediately available to help. CERT members also are encouraged to support emergency response agencies by taking a more active role in emergency preparedness projects in their community. The GP/LCP and CAP are policy-level documents and do not propose any specific development, infrastructure construction, or increased density or intensity of uses that would impair emergency evacuation. Therefore, no impact would occur.

b) Wildfires do not represent a significant threat due to an elevated water table and the relatively flat and urbanized nature of the area; however, fire is always a threat in an urbanized environment. The Safety Element includes policies and actions related to wildfire hazards to reduce risk and increase community resiliency and adaptive capability. The updated Safety Element of the GP/LCP complies with SB 379 requirements, codified as California Government Code section 65302(g)(4), to address climate change mitigation, adaptation, and resiliency in general plans for eliminating and reducing the risk to wildfire. These issues are also addressed in the City’s CAP, and discussed in the Conservation and Ecotourism Element, and elsewhere in the GP/LCP. The integration of climate change policies throughout the plan helps to ensure that climate change and risks to wildfires will be a core consideration of future planning decisions, programs, and actions. Therefore, a less than significant impact would occur.

c) The GP/LCP and CAP documents are policy documents that do not propose specific development. If future development projects would be proposed that required the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment, then the project would be subject to discretionary review. Therefore, a less than significant impact would occur.

d) See Section VII (a.iv). Since the terrain of Imperial Beach is generally flat and urbanized, the potential for landslides resulting from wildfire to occur is low. There are, however, small cliffs within Border Field State Park and at the south end of Seacoast Drive (Safety Element 2018). Limited landslides may occur in these areas. However, the project does not propose to intensify these areas or remove any existing development restrictions from these areas. Future development would continue to comply with applicable UBC and CBC standards, resulting in a less than significant impact.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially 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, substantially 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) 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 checked="" type="checkbox"/>	<input type="checkbox"/>
c) 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a) As previously stated in IV (a–f), the GP/LCP and CAP would not modify, either directly or indirectly, habitats of any species identified as a candidate, sensitive, or special status species. The GP/LCP and CAP include measures for improvement related to increasing mass and sustainable transportation, climate resiliency, sustainability, and economic development, all of which would occur primarily within developed and/or infill areas where habitat for listed species would not exist. Furthermore, the City is largely developed and any existing applicable federal, state, and/or local policies would prevent development in areas that support sensitive or special status species. Additionally, the GP/LCP would require that new development avoid or minimize impacts to, and provide mitigation for, any adversely impacted special status, threatened, listed, or endangered plant and animal species consistent with all state and federal regulations (GP/CLP Policy 4.3.1). The conversion of the salt marsh land use from Urban Reserve to Open Space preserves the biodiversity of the marsh as well. Therefore, the impact would be less than significant.

b) There have been no significant impacts identified that could cause substantial adverse effect either directly or indirectly. In fact, the project seeks to improve the community’s resiliency, sustainability, and global climate protection goals. As the project has no significant direct or indirect impacts, it is not anticipated that it will contribute to any cumulatively considerable impacts locally, regionally, or globally. This impact is less than significant.

c) As identified in the Initial Study, there have been no significant impacts identified that could cause substantial adverse effect on human beings either directly or indirectly. Furthermore, the City’s design review process and permit and code requirements will be applied to each development project and no aspect of the GP/LCP and CAP could cause adverse effects on human beings. Therefore, the impact would be less than significant impact.

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ATTACHMENT 2

KEY PROPOSED GENERAL PLAN EDITS AND COASTAL ACT CONSISTENCY SUMMARY



Key Proposed General Plan Edits and Coastal Act Consistency Summary

Overall Notes:

- Maintains City vision, and “Big Picture” and Small Beach Town goals
- Background sections updated to reflect existing conditions, changes in state law, regional plans, and City plans and ordinances.
- Related Coastal Act sections described up front, excerpted at the end of each element, and incorporated into the General Plan/Local Coastal Program (LCP).
- Formatted each element to the following order and content:
 - Goals – desired end state
 - Background – provides context
 - Sections – topic areas, numbering system identifies element, section and policy
 - Policies – Concise and action-oriented statements

Land Use Element

Existing – Land Use Element	New Approach – 2.0 Land Use Element	Rationale and Coastal Act Consistency
Table L-1 1993 Build Out Land Use	Table deleted. New Table L-1 provides land use designation by acreage.	Table was outdated. No changes to development capacity with this update. Housing Element contains current housing capacity.
Goal 11 Small Beach Oriented Town with a-e subparagraphs	Maintains goal for small beach-oriented town. Added goals for: climate resiliency, sustainability, and economic prosperity; equitable and healthy communities; Local Coastal Program (LCP) integration	Supports implementation of Coastal Act, new state laws pertaining to climate change and environmental justice, and the General Plan Update theme of working toward environmental, economic and community goals.
	Section 2.1 Land Use Framework Contains discussion and policies outlining the City’s approach to setting development parameters that are consistent with retaining the City’s resource protection and community character goals.	Coastal Act Sections: 30213; 30221, 301222, 30250, 30152 Ensures that the Land Use Plan (LCP – LUP) provides policies with appropriate detail and specificity to effectively guide the update of the LCP Implementation Plan (IP) standards and implementing ordinances.
Policy L-1 Land Use and Zoning Map	Figure L-1 Land Use Map Salt Pond 10A proposed from Urban Reserve to Open Space.	Land Use Map belongs in the General Plan. Zoning Map belongs in the Zoning Ordinance. Salt Pond 10A habitat restoration has taken place.
-	Figure L-2 added to show land and water under San Diego Unified Port District Jurisdiction	Provides information supporting Update collaboration policies.

Existing – Land Use Element	New Approach – 2.0 Land Use Element	Rationale and Coastal Act Consistency
Policy L-2 Land Use Categories	<p>See policies 2.1.3 and 2.1.4. Content maintained.</p> <p>Policy 2.1.6 Evaluate discretionary project proposals on a case-by-case basis for their impacts on the economy, environment, and social and community character.</p>	<p>Clean-up revisions for clarity and consistency with recent zoning amendments.</p> <p>Case-by-case project review is consistent with Ad Hoc Committee recommendations and helps implement the Coastal Act.</p>
-	<p>Section 2.2 Sustainable Development. Policies include supporting infill that does not have adverse impacts on coastal resources, encouraging adaptive reuse of buildings, and supporting development where there is transit access. New policies supporting resiliency include:</p> <p>Policy 2.2.5 - Adopt sea level rise adaptation approaches that both preserve public access and public and private infrastructure.</p> <p>Policy 2.2.6 - Implement and enforce up-to-date building codes to reduce vulnerability, increase public safety and protect public property from flooding, fire, extreme weather and other risks.</p>	<p>Coastal Act Section 30252. Furthers climate change mitigation and adaptation goals. Reduces vulnerability and builds resiliency to sea level rise and other risks. Supports consistency with the Regional Sustainable Communities Strategy.</p>
Policy L-3 Residential Uses and Neighborhoods	<p>Section 2.3 – Residential Use and Neighborhoods</p> <p>Key message of policies maintained, with new policies to support healthy communities/active living. Policies related to design and transitions now found in Design Element.</p>	<p>Clean-up revisions for clarity and consistency with recent zoning amendments.</p> <p>New policies support state law and local goals.</p>
Policy L-4 Commercial and Mixed-Use Areas	<p>Section 2.4 – Commercial and Mixed-Use Areas</p> <p>Key message of policies maintained, with additional text supporting active living and mixed-use development. Clarifying edits made consistent with recent Zoning Ordinance amendments and applicable design guidelines.</p>	<p>Clean-up revisions for clarity and consistency with recent zoning amendments. Approach affirmed through LCP Update public outreach activities.</p>
-	<p>Section 2.5 – Coastal Priority and Visitor-Serving Commercial Uses. See discussion associated with existing Policy L-6, below</p>	-
-	<p>Section 2.6 – Airport Land Use Compatibility and Military Coordination. See discussion associated with existing Policy L-5, below.</p>	-
-	<p>Section 2.7 Environmental Justice and Healthy Communities</p> <p>New slate of policies addressing environmental justice including: reducing health risk, promoting civic engagement, and prioritizing public facilities to match need.</p>	<p>Implements direction per AB 2616 (2016), state general plan guidance, Coastal Act implementation guidance, and local goals. Reflects input from public meetings regarding enforcing environmental standards. Benefited from UCSD and County of San Diego collaboration</p>

Existing – Land Use Element	New Approach – 2.0 Land Use Element	Rationale and Coastal Act Consistency
Table L-2 Land Use Designations and Specifications	<p>Table L-2 Land Use Designations. Clarifying edits describing land use designations. Implementing zones identified.</p> <p>Allows additional flexibility for uses to be considered that are deemed compatible with the primary permitted uses.</p>	<p>Section 30250 (a) of the Coastal Act and its general requirements for siting new development in existing developed areas.</p> <p>General Plan is the policy document. The Zoning Ordinance is appropriate location for code specifications. The additional flexibility for uses is to be implemented through a conditional use permit, as described in the proposed Zoning Code amendments (part of the LCP Implementation Plan).</p>
Policy L-5 Ream Field Urban Reserve Area	Section 2.6. Edits to emphasize City’s support for military operations at Ream Field, rather than encouraging closure. New policies to encourage coordination, pursue shared use public facilities, and to maintain compatible noise and safety contours. Maintains the Urban Reserve land use designation.	Ream Field is no longer being considered for closure. City intends to pursue co-benefits from military investments and economic and environmental activities where possible.
Policy L-6 Tourist Commercial Area	Section 2.5 - Edits to support Coastal Act and City’s goals for tourism, ecotourism and overall economic development; environmental sustainability; and community character.	Supports implementation of Coastal Act sections 30213, 30221, 30222, 30250, and 30255. Supports integration of ecotourism and economic sustainability goals; supports and updates IB Big Picture goals.
Policy L-7 Revitalization	See Design Element - Section 8.2. See Policy 8.2.7. Edits to recognize state law changes and City actions that have taken place since 1994.	Meets state law and current City conditions; reflects City’s financing strategy.
Policy L-8 Bayfront/Marina	Land Use Section 2.5 and Design Element Section 8.3. Edits to support Coastal Act and City’s goals for tourism, ecotourism and overall economic development; environmental sustainability; and community character.	Edits support the City’s recent Zoning Ordinance amendments, and longstanding planning documents including the City’s 2005 <i>Urban Waterfront and Ecotourism Study</i> and <i>Imperial Beach – The Big Picture</i> .
Policy L-9 Lower Cost Visitor and Recreational Facilities	Section 2.5. Edits to support Coastal Act and City’s goals for tourism, ecotourism and overall economic development; environmental sustainability; and community character.	Coastal Act Section 30213, 30221, 30222 and 30250. Edits support the City’s recent Zoning Ordinance amendments, and longstanding planning documents including the City’s 2005 <i>Urban Waterfront and Ecotourism Study</i> and <i>Imperial Beach – The Big Picture</i>

Mobility Element

Existing – Circulation Element	New Approach – Mobility Element	Rationale and Coastal Act Consistency
Figure C-1 Regional Transportation Access	Identifies regional access along with other streets on Figure M-2 and discusses the role of the Regional Transportation Plan.	Approach is consistent with an integrated, multi-modal transportation system.
Figure C-2 Street System & Traffic Volumes	Figure M-2 Street Typologies	Approach is consistent with an integrated, multi-modal transportation system.
Table C-1 Intersection Level of Service Definitions	Figure M-1 Sustainable Transportation Hierarchy	A modal hierarchy of users, as shown on Figure M-1, provides a framework to inform planning, design, and operational decisions. The hierarchy is intended to consider and give priority to the most vulnerable users of the roadway and the most resource efficient transportation modes
Table C-2 Intersection Level of Service	Deleted.	In accordance with state law, the City will develop a metric and thresholds of significance for Vehicle Miles Traveled (VMT), or adopt regional standards when available, to replace level of service as the primary determinant of transportation impacts.
Figure C-3 Bus Routes	Updated	Updated for consistency with the current Regional Transportation Plan
Figure C-4 SANDAG Regional Feeder Bikeways	Replaced with Figure M-5.	Provides a consolidated bikeway plan map.
Goal 1 Balanced Circulation with a-e subparagraphs	Four distinct goals proposed focusing on Complete Streets, small beach town atmosphere, sustainable development, healthy active living, innovative technology and greenhouse gas reduction. Moves away from a vehicle level of service (LOS) goal to a multi-modal network focus.	The Coastal Act Section 30253 calls for a reduction in vehicle miles traveled among other requirements. The Coastal Commission's LCP Update Guide calls for Complete Street requirements to be addressed per AB 1358 (2008). Complete Streets policies are a commitment to providing safe and comfortable mobility options for all users. Adopting Complete Streets policy language also helps position the City to compete for grant funds. In addition, the City anticipates transitioning from a level of service to a Vehicle Miles Traveled (VMT) metric as the primary means to determine transportation impacts, in accordance with Senate Bill 743 (Steinberg, 2013).
Policy C- 1 Street Classification Plan, Design Standards and Dedication Requirements	Section 3.1. New Street Typology System proposed to supplement the City's existing classification system. LOS policies removed.	A new Street Typology system categorizes streets based on character, land uses, functionality, and intended users. It is intended to help guide the selection of design elements that re consistent with roadway environments.

Existing – Circulation Element	New Approach – Mobility Element	Rationale and Coastal Act Consistency
Policy C-2 Street Design and Access	Replaced with multi-modal street design and access policies 3.1.6 – 3.1.24.	Edits are aligned with the City's new Complete Streets approach. Embraces innovative technologies and supports mobility choices to reduce greenhouse gas emissions and vehicle miles traveled. Supports General Plan focus on supporting an active, healthy community and helps position the City for grant opportunities.
Table C-3 Minimum & Maximum Two-Way Traffic Curb Cuts Widths	Curb cuts addressed in Policy 3.1.12 - 3.1.15	Edits are aligned with the City's new Complete Streets approach
Figure C-5 Street Classifications	Figure M-2 Street Classifications	Map updated in GIS
Policy C-3 Ream Field Access	Policy revised to call for collaboration with the City of San Diego.	Removes obsolete guidance.
Policy C-4 Imperial Beach Boulevard Identification	Revised to focus on collaboration.	Removes obsolete guidance.
Policy C-5 Street Improvements	Replaced with policies to require future street improvements to meet City specifications and provide safe and efficient mobility for all users. Added Policy 3.1.11: "As deemed necessary, require developers to dedicate right-of-ways and street improvements associated with their projects."	Removed reference to obsolete Table C-4. Edits are aligned with the City's new Complete Streets approach.
Policy C-6 Traffic Signal Timing	Policy replaced with more comprehensive approach to Intelligent Transportation Systems. See Policy 3.1.23	Modernizes language, updates policies and approach for consistency with the Regional Transportation Plan and Sustainable Communities Strategy.
Table C-4 Improvements Needed to Handle Year 2015 Traffic	Deleted table, which identified improvements as illustrative, and allowed for studies to be conducted at time of need to modify the recommendations. Added Policy 3.1.27 for evaluation of system improvements as project-level implementation opportunities arise.	Modernizes language and is aligned with the City's new Complete Streets approach.
-	Policies 3.1.28 and 29 are new policies regarding ways to prepare for the future and address traffic and parking. The policies are to strive for use of intelligent transportation systems and to evaluate and support autonomous vehicle technology that advances City goals.	Transportation and related technologies are changing rapidly. To prepare for autonomous vehicles, policies that promote flexibility are proposed so the City may maximize benefits and limit unintended consequences.
Policy C-7 Truck Routes	Truck Route Overlay is shown on Figure M-2 and included in discussion section. Street parking restrictions provided in Policy 3.5.6.	Map updated in GIS.

Existing – Circulation Element	New Approach – Mobility Element	Rationale and Coastal Act Consistency
Policy C-8 80 Foot Right-of-Ways	Updated element maintains and supplements City design specification and calls for best practice design. See Policy 3.1.17.	Modernizes language, calls for implementation best practices at the time future projects are evaluated, and is aligned with the City's new Complete Streets approach.
Policy C-9 Comprehensive Transit Services	Updated policy to reflect current regional proposals and efforts to improve transit services	Modernizes language, updates policies and approach for consistency with the Regional Transportation Plan and Sustainable Communities Strategy.
Policy C-10 Light Rail	Deleted. See Section 3.2 Public Transit.	Modernizes language, updates policies and approach for consistency with the Regional Transportation Plan and Sustainable Communities Strategy.
Policy C-11 Bus Stops and Bus Transfer Points	Deleted. Policies focus on expanding transit and multi-modal facilities on Palm Avenue.	Modernizes language, updates policies and approach for consistency with the Regional Transportation Plan and Sustainable Communities Strategy.
Policy C-12 Transit Facilities	Section 3.2 Public Transit	Modernizes language, updates policies and approach for consistency with the Regional Transportation Plan and Sustainable Communities Strategy.
Policy C-13 Ridesharing	Minor edits to policy	Includes a new section addressing Transportation Demand Management (TDM).
Policy C-14 Management Programs	Minor edits to modernize language	The mobility system as a whole can operate more efficiently and more safely through the use of Intelligent Transportation Systems (ITS) and TDM
Policy C-15 Bikeways Plan	Replaced with Section 3.3- Bicycle Mobility.	Edits to modernize language, to reflect improvements to the system made since the element was last updated, and to be aligned with the City's new Complete Streets approach.
Policy C-16 Ecoroute Bikeway	Text updated to report that the Ecoroute was completed in accordance with the General Plan in 2013.	"
Policy C-17 Bayshore Bikeway Extension	Same as C-15	"
Policy C-18 Bike Route – Palm Avenue Corridor	Same as C-15	"
Figure C-6 Bikeways Plan	Same as C-15	"
Figure C-7 Ecoroute Bikeway	Same as C-15	"
Policy C-19 Bicycle Facilities Encouraged	Same as C-15	"
Policy C-20 SANDAG Bikeways Plan	Same as C-15	"

Existing – Circulation Element	New Approach – Mobility Element	Rationale and Coastal Act Consistency
Policy C-21 Pedestrian Circulation	Replaced with Section 3.4 – Pedestrian Mobility.	Edits to modernize language, to reflect improvements to the system made since the element was last updated, and to be aligned with the City’s new Complete Streets approach.
Policy C-22 Parking	See new Section 3.5 – Parking. Expands policies from supply focus to an approach that addresses parking needs from a supply, management and technologies perspective. References Zoning Ordinance parking requirements. Adds importance of small-town character to parking discussion.	Edits are aligned with the City’s new Complete Streets approach and proposed Climate Action Plan recommendations. Character discussion helps implement Ad Hoc Committee’s recommendations.
-	Expands discussion and policies regarding coordination with SANDAG and others	Approach is consistent with regional plans and trends.
-	Section 3.6 - Performance Measures Calls for future monitoring	Helps strengthen the understanding of travel behaviors and related responses to future investments.

Conservation & Ecotourism Element

Wetlands and ESHA Approach Overview

The Conservation and Ecotourism Element is intended to serve as the Water and Marine Resources component of the Imperial Beach Local Coastal Program and meet the intent of the Environmentally Sensitive Habitat Areas (ESHA) component of the Coastal Act. Open space and conservation planning are fundamental components of the Imperial Beach General Plan. The City of Imperial Beach has taken a proactive stance toward wetlands and sensitive habitat areas. Policy support for resource conservation and sustainable coastal development is found throughout each of the General Plan elements.

Environmentally protected open space habitat in the Tijuana River watershed is the predominant land use in the City. Along the City’s southern border is the Tijuana River Valley which contains one of the largest intact coastal wetland systems in Southern California. The lower section of the Tijuana River Watershed encompasses 2,293 acres of the Tijuana River National Estuarine Research Reserve (TRNERR). The [National Estuarine Research Reserve System](#) (NERRS) is a network of protected areas established for long-term research, education, and stewardship. Through a partnership between the National Oceanic and Atmospheric Administration’s Estuarine Reserves Division and the coastal states, the NERRS plays a critical role in sustaining the nation’s estuaries and coastal communities. The TRNERR includes the Tijuana Slough National Wildlife Refuge (managed by the U.S. Fish and Wildlife Service) and Border Field State Park (managed by California State Parks). Approximately 928 acres of the TRNERR are located within Imperial Beach city limits.

In 2010, the TRNERR prepared an updated “Comprehensive Management Plan”. The key goal of the Comprehensive Management Plan is “to protect, restore and enhance the viability of key coastal habitats and species and preserve the region’s cultural heritage while encouraging compatible public use, education and research.” In addition, planning is underway for the Tijuana Estuary Tidal Restoration Program- a large multi-phased wetland restoration program involving up to 500 acres of restoration. Its primary objective is to restore valuable

habitat processes that have been lost, and to increase the exchange of water in a tidal cycle. This will enhance flushing, improve water quality, and enhance natural processes that deliver sediment from the watershed to the ocean (Revell, 2016). The City recognizes and supports the importance of the TRNERR for its ecological and open space values.

The City's position is that the TRNERR should not be called out as an ESHA as it is already protected from development with its designation as a Preserve (which is the objective of an ESHA), is under the management of the wildlife agencies, and has a currently established buffer requirement. The current protected status of TRNERR is further emphasized by its designation by the International Ramsar Convention, 2005, as a "Wetland of International Importance." Since TRNERR is: 1) federally protected open space, 2) not at risk from development or easily disturbed or degraded by human activities and developments, and 3) the City supports implementation of the Estuaries Resource Protection Program, there is no additional resource benefit derived from the ESHA designation.

Regarding San Diego Bay, Imperial Beach is bordered on the north by the South San Diego Bay Unit of the San Diego National Wildlife Refuge (managed by the U.S. Fish and Wildlife Service). The refuge encompasses 2,620 acres of intertidal mudflats, eel grass beds, salt marshes, and submerged tidelands in San Diego Bay. It supports numerous endangered and threatened species of plants and animals. Major habitat restoration of the former western salt ponds started in 2010 and is ongoing.

The concept of balance and achievement of environmental, economic and community goals is critical to successful implementation of Coastal Act policies as well as the full range of state planning laws. It is important to be able to plan for development and redevelopment of targeted sites adjacent to the San Diego Bay in order to foster the City's ecotourism policies, provide needed housing, foster redevelopment to implement new and more resilient building code standards, and maintaining a healthy economic base. Without adequate fiscal resources, the City would be unable to finance ongoing maintenance of coastal open space, parks, and visitor-serving resources and public facilities that are central to implementation of the Coastal Act.

Existing – Conservation and Open Space Element	New Approach – Conservation and Ecotourism Element	Rationale
-	<p>Section 4.1 – Climate Change. Adds discussion and policies on climate change. Climate change covers many General Plan topic areas. Table CE-1 provides a guide to climate planning topics found in five General Plan Elements.</p> <p>Policies are added addressing the overall approach and specific emission categories.</p> <p>Policy 4.1.12 addresses "blue carbon" GHG measures to recognize the role of wetlands in carbon capture.</p>	<p>This section provides the policy framework for greenhouse gas (GHG) reduction measures detailed in the City's draft Climate Action Plan. The integration of climate change policies throughout the plan helps to ensure that climate change will be a core consideration of future planning decisions, programs, and actions.</p> <p>Supports implementation of state climate change legislation, Coastal Act Section 30253, the regional Sustainable Communities Strategy, and local vision and goals.</p>
-	<p>Section 4.2 – Urban Forestry See discussion associated with existing Policy CO-3, below.</p>	-

Existing – Conservation and Open Space Element	New Approach – Conservation and Ecotourism Element	Rationale
-	Section 4.3 - Biological Resources See discussion associated with existing Policy CO-5, below.	-
Figure CO-1 Tijuana River National Estuarine Research Reserve	Updated GIS map Figure CE-1	-
Figure CO-2 Estuary Vegetation	Estuary vegetation image will be included in the final draft document.	-
Figure CO-3 Estuary Wildlife	Estuary wildlife image will be included in the final draft document.	-
-	<p>Include a sidebar with the definition of Environmentally Sensitive Habitat Area (ESHA) per Section 30107.5 of the Coastal Act.</p> <p>Sections 30107.5 and 30240 (a) regarding ESHA is also directly incorporated into the General Plan/LCP in the text box at the end of the element.</p>	<p>Coastal Act Section 30107.5 and 30233 (a) regarding ESHA are incorporated into the General Plan/LCP. The definition of ESHA is in the Discussion section as well.</p> <p>In Imperial Beach, sensitive habitat areas around San Diego Bay and the Tijuana River have been preserved and protected through City initiatives and partnerships with state and federal agencies.</p>
Goal 2 Natural Resources - Key Foundation of The City	New goals maintain goal purpose with organization and wording edits.	-
Goal 3 Resources and Open Space Belong to Everyone	Maintains goal purpose with organization and wording edits.	-
Policy CO-1 The Beach	See Parks, Recreation and Coastal Access Element, Section 5.2. Modernizes language; expands concept to address complete streets and healthy communities.	-
Policy CO-2 Ocean Water Quality	Section 4.4 – Water Quality maintains policy	-
Policy CO-3 Landscaping	<p>Section 4.2 – Urban Forestry maintains and expands policy</p> <p>Policy 4.2.4: “Develop and maintain an active civic landscaping plan for all public landscaped areas under City management to promote the urban forest.” The policy also includes sub-policies a-f. Sub-policy d gives preference to species that are drought- and salt-tolerant, native, and noninvasive plants to the extent feasible.</p>	The policy expresses a preference for native and non-invasive plants to support sustainability and conservation.

Existing – Conservation and Open Space Element	New Approach – Conservation and Ecotourism Element	Rationale
Policy CO-4 Ream Field	Addressed in the Land Use Element Section 2.6. Maintains Urban Reserve land use designation. Changes emphasis from encouraging Ream Field redevelopment to supporting the Navy’s mission and seeking mutual benefits through coordination.	-
Policy CO-5 Estuary	<p>Section 4.3 – Biological Resources This section updates and expands existing policy.</p> <p>Policy 4.3.1 states “Require that new development avoid or minimize impacts to, and provide mitigation for, any adversely impacted special status, threatened, listed, or endangered plant and animal species consistent with all state and federal regulations.”</p>	Coastal Act Section 30233 (a) is included in the element and incorporated by reference.
Policy CO-5 Estuary – Buffer	<p>The City’s existing buffer policy is proposed to be maintained as Policy 4.3.2. The City recognizes and supports the importance of the Tijuana River Natural Estuarine Research Reserve both for its ecological and open space values. In this regard, the City shall: Assist in the implementing of the Estuaries Resource protection program, which includes the following development restrictions: "A buffer area will be established for each development adjacent to wetlands. The width of a buffer area will vary depending upon an analysis. The buffer area should be a minimum of 100 feet unless the applicant can demonstrate to the satisfaction of the State Department of Fish and Game and U.S. Fish and Wildlife that 100 feet is unnecessary to protect the resources of the habitat area. If the project involves substantial improvements or increased human impacts, such as a subdivision, a wider buffer area may be required. For a wetlands the buffer area should be measured from the landward edge of the wetland."</p>	<p>After careful consideration, the City has determined its existing buffer policy, included as Policy 4.3.2, has successfully protected the Reserve for many years and should be maintained.</p> <p>Buffer widths should be determined on a fact-specific basis. Coastal Act section 30240 does not specifically reference buffers but notes development adjacent to ESHA should be sited and designed to prevent impacts to ESHA.</p> <p>A hard limit should not be set if the Coastal Commission and resource agency staff agree to an alternate approach. City recommends that public improvements such as paved bikeways and other infrastructure and uses benefitting the public should be allowed in buffer areas.</p> <p>Note that the National Estuarine Research Reserve System is a network of 29 coastal sites designated to protect and study estuarine systems. Established through the Coastal Zone Management Act, the reserves represent a partnership program between NOAA and the coastal states. NOAA provides funding and national guidance, and each site is managed on a</p>

Existing – Conservation and Open Space Element	New Approach – Conservation and Ecotourism Element	Rationale
		daily basis by a lead state agency or university with input from local partners.
Policy CO-5 Estuary – Management	Policy 4.3.4 - “Support the efforts of habitat preserve managers to adaptively manage the TRNERR to ensure adequate connectivity, habitat range, and diversity of topographic and climatic conditions are provided for species to move as climate shifts.”	Adaptive management helps build resiliency to climate change and sea level rise. Emphasizes international significance of Tijuana Estuary.
Policy CO-6 Air Quality	Section 4.5 – Air Quality. Maintains policy with organization and wording edits. References Mobility Element Complete Streets approach.	Policies support climate goals and Complete Streets approach.
Policy CO-7 Urban Water Run-Off	<p>Section 4.4 – Water Quality.</p> <p>Policy 4.4.7 - “Require implementation of runoff management practices that minimize the volume of urban runoff discharged to receiving waters in areas where minimizing impervious surface is not possible.”</p> <p>See also Policy 4.4.12 for BMP examples</p> <p>See Policy 4.7.11 discussed below, for additional support.</p>	Policies support and complement the requirements of the Municipal Separate Storm Sewer System Permit (MS4)
Policy CO-8 Wetlands	See Coastal Act Policies – Conservation, Section 30233 (a), in the callout box at end of the element. Wetlands are addressed in Section 4.3 – Biological Resources.	Coastal Act Section 30233 was incorporated into the element.
Policy CO-9 Water Quality and Watershed Protection	<p>Section 4.4 – Water Quality. Updates and expands policy consistent with Municipal Separate Storm Sewer System Permit (MS4). Adds text related to binational pollution.</p> <p>Also see references under Policy CO-7, above.</p>	<p>Policies support and complement the requirements of the MS4 permit.</p> <p>Public comment received during the GP/LCP update process highlighted the importance of addressing binational pollution from environmental quality and environmental justice perspectives.</p>
-	<p>4.6 – Cultural Resource Tribal Cultural Resources.</p> <p>Adds new goals and policies.</p>	Addresses SB 18 and AB 52 requirements.
-	<p>4.7 - Ecotourism. Adds new goals and policies, including:</p> <p>Policy 4.7.2 New visitor-serving uses should not displace existing low-cost visitor-serving uses unless an equivalent low-cost replacement is provided where feasible.</p> <p>Policy 4.7.11 “Continue collaboration with agencies such as the Unified Port of San Diego, the U.S. Fish and Wildlife Service, and the</p>	<p>Modernizes language, updates policies and approach consistent with General Plan Update theme of working toward environmental, economic and community goals.</p> <p>Edits support the City’s recent Zoning Ordinance amendments, and key concepts from longstanding planning documents including the City’s 2005</p>

Existing – Conservation and Open Space Element	New Approach – Conservation and Ecotourism Element	Rationale
	<p>TRNERR to enhance the beach, San Diego Bay shoreline, Tijuana River Estuary, and trail networks.” Also includes sub-policies a-f.</p> <p>Sub-policy b. is to “Support wetland restoration of Pond 20.” Subpolicy e. is to “Support research, cultivation, and farming (aquaculture) of coastal resources, and other eco-tourism endeavors, in a manner that is sustainable and designed to minimize impacts on coastal resources to the maximum extent feasible.”</p> <p>Policy 4.7.12 Implement a signage and wayfinding program to attract Bayshore Bikeway cyclists to visit the Bikeway Village and Seacoast Commercial District consistent with the signage policies of the LCP.</p>	<p><i>Urban Waterfront and Ecotourism Study and Imperial Beach – The Big Picture.</i></p>

Parks, Recreation & Coastal Access Element

Existing – Parks, Recreation and Access Element	New Approach – Parks, Recreation and Coastal Access Element	Rationale and Coastal Act Consistency
Table P-1 Park and Recreation Facilities	Updated to reflect existing conditions.	-
Figure P-1 Park and recreation Facilities	Updated to reflect existing conditions.	-
Figure P-2 Walking Distance	Figure P-2 updated.	-
Discussion p. P-7	References to (former) National Recreation and Park Association standards in discussion text deleted.	Standards are outdated.
Goal 13 The City Shall Provide Adequate Parks and Recreation Amenities for A Healthy Environment and Quality of Life with a-e subparagraphs	Maintains goal content with some wording edits.	-
Policy P-1 Opportunities for All Ages, Incomes, and Life Styles	Maintains policy intent with organization and wording edits. Added new policies on striving for equity in the provision of parks. See policies 5.1.1, 5.1.3, 5.1.12, and 5.1.13	Helps implement local goals and state General Plan and Coastal Act implementation guidance for environmental justice.
Policy P-2 Ocean and Beach Are the Principal Resources	<p>Section 5.2 – Public Coastal Access</p> <p>Continues to recognize the importance of the ocean and beaches as recreational assets. See policies 5.1.4, 5.2.1- 5.2.5</p>	Meets local goals and Coastal Act guidance. The beach, bay and estuary are key recreational amenities for residents and visitors.

Existing – Parks, Recreation and Access Element	New Approach – Parks, Recreation and Coastal Access Element	Rationale and Coastal Act Consistency
Policy P-3 Joint School/Park Sites	Continues and expands policies supporting joint use. See policies 5.1.5 – 5.1.6;5.1.9; 5.2.6 – 5.2.7	Emphasizes importance of joint use and coordination with other government agencies
Policy P-4 Private Sector Open Space, Parks and Recreation	Maintained as Policy 5.1.7	-
Policy P-5 Recreation Programs	Policy edited but core content maintained. See policies 5.1.1,5.1.2, 5.1.4, 5.1.8,5.2.1- 5.2.5	-
Policy P-6 Design of Visitor and Recreational Facilities	Policy edited but core content maintained. Same references as Policy P-5	-
Policy P-7 Increase Tourist Related Commercial Land Uses	Policy edited but core content maintained. See Land Use Element Section 2.5 – Coastal Priority and Visitor-Serving Commercial Uses.	-
Policy P-8 Bayfront Park	Policy edited but core content maintained and expanded. Policy 5.2.10 addresses enhancing public coastal access in the City through the creation of a linear park or other activating uses along the City Bayfront.	Complementary policies are in Land Use Element Section 2.5 and the Design Element Policy 8.3.2. Future potential project impacts will be evaluated on a case-by-case basis, per Land Use Element Policy 2.1.7
Figure P-3 Bayfront Park	Imagery to be added to final draft.	-
Policy P-9 New Park Land	Policy for the City to pursue expansion of new park land maintained. Policies added to also pursue other park system improvements. See Policies 5.1.11 - 5.1.14.	Recognizes importance of park land as well as improved recreational facilities in serving the community.
Table P-2 Vertical and Lateral Coastal Access	Table has been updated to reflect existing conditions. New policy language on maintaining coastal access and increasing resiliency to sea level rise (see also Safety Element). California Coastal Trail language added.	Addresses Coastal Act sections: 30210; 30211; 30214 Edits are consistent with Coastal Act implementation guidance. Public workshops provided an opportunity for the public to provide input on access points.
Figure P-4 Vertical and Lateral Coastal Access	Figure P-3 – updated in GIS	-
Goal 14 Shoreline Access	Section 5.2 - Public Coastal Access added to cover Coastal Act requirements for lateral and vertical access, and to address sea level rise. Policies include: 5.2.1 Maintain free public beach access. 5.2.2 Maintain a comprehensive network of improved beach access facilities at all	Addresses Coastal Act sections: 30210; 30211; 30214 Policies added to address public access broadly, including alternative modes of transportation to support public access and reduction of GHG emissions.

Existing – Parks, Recreation and Access Element	New Approach – Parks, Recreation and Coastal Access Element	Rationale and Coastal Act Consistency
	<p>designated primary beach access points to ensure safe access to all public beaches and continue to improve, maintain, enhance and maximize public use of the beach access points and beach facilities.</p> <p>5.2.3 Provide physical access to the City's coastal resource areas for all segments of the population, consistent with public safety needs and without overburdening the City's public improvements or causing substantial adverse impacts to adjacent private property owners.</p>	
	<p>Policy 5.2.9 addresses public parking and access via public transportation.</p>	<p>Specifications for the precise location, number of, and time-limits related to parking spaces are not included. These factors change over time and should not be in the General Plan/LUP. The City needs to be able to impose reasonable time restrictions on street ends for public safety purposes.</p>
<p>Policy P-10 Amend San Diego Unified Port District Master Plan</p>	<p>Edits to continue working collaboratively with the San Diego Unified Port District (SDUPD).</p> <p>Policy 5.2.10 addresses public coastal access through street ends.</p>	<p>The SDUPD owns and leases land in Imperial Beach. Continued collaboration is mutually beneficial. SDUPD is currently updating the Port Master Plan.</p>
<p>Policy P-11 Coordinate with State and Federal Agencies</p>	<p>Element policies continue to call for coordination with state and federal agencies, as well as other agencies, the private sector, and others.</p>	<p>Continued collaboration is mutually beneficial</p>
<p>Policy P-12 Maintain Environmental Quality</p>	<p>Maintained as Policy 5.2.8</p>	<p>-</p>
<p>Policy P-13 Improving Accessways</p>	<p>Policy edited but core content maintained. See Policy 5.2.9.</p>	<p>-</p>
<p>Policy P-14 Retain Existing Street Ends</p>	<p>Policy edited but core content maintained. See Policy 5.2.10.</p>	<p>-</p>
<p>Policy P-15 Ocean Lane and Alleys West of Seacoast Drive</p>	<p>Policy edited but core content maintained. See Policy 5.2.11.</p>	<p>-</p>
<p>Policy P-16 Prescriptive Rights</p>	<p>Maintained. See Policy 5.2.12.</p>	<p>-</p>

Facilities and Services Element

Existing – Facilities and Services Element	New Approach – Facilities and Services Element	Rationale and Coastal Act Consistency
Goal 5 - Facilities and Services Concurrent with Need	Goal maintained with minor wording edits	-
Figure F-1 Public Facilities	Figures to be determined in final draft.	-
Policy F-1 Development Impact	Section 6.1 – Capital Improvement Planning and Financing Policy maintained. See Policy 6.1.1	-
Policy F-2 Capital Improvement Planning	Policy edited but core content maintained. See Policy 6.1.2	-
Policy F-3 Public Facility Locations	Policy edited but core content maintained. See Policy 6.1.2 New Policy 6.1.3 to consider sea level rise in the design and location of public facilities.	Supports resiliency goals.
Policy F-4 Relocate City Yard	Policy expanded to address private/public partnerships and evaluation for highest and best community use. See Policy 6.1.4.	-
-	Policy 6.1.5 covers green infrastructure.	Supports use of a combination of green (nature-based) and grey (engineered projects) as appropriate. Supports climate mitigation and resilience.
Policy F-5 Retain Existing Civic Center Complex	Section 6.1 Capital Improvement Planning and Financing. Covered in Discussion text	-
Policy F-6 Fire Rating	Section 6.2 Fire and Emergency Services Edits to update baseline facilities information.	Provides up-to-date information.
Policy F-7 Public Information and Involvement	Section 6.3 – Law Enforcement Policy edited but core content maintained. See policies 6.3.1 – 6.3.2.	Provides up-to-date information.
Policy F-8 Crime Rates	Section 6.3 Law Enforcement. Edits to update baseline facilities information. See Policy 6.3.3.	Provides up-to-date information.
Policy F-9 Library Size	This section has been updated. The new Imperial Beach Library is described in the discussion section of Section 6.1.	Provides up-to-date information.
Policy F-10 Alleys	Section 6.4 – Public Rights-of-Way. This section has been updated, including discussing risks due to sea level rise and climate change.	Provides up-to-date information.
Policy F-11 Drainage	This section has been updated and is found in the Design Element. See Policy 8.2.7.	Provides up-to-date information.

Existing – Facilities and Services Element	New Approach – Facilities and Services Element	Rationale and Coastal Act Consistency
Policy F-12 Sidewalks/Tree lawns	This section has been updated. Sidewalks are covered in Section 6.4. Supportive policies are also found in the Conservation Element Section 4.2 - Urban Forestry, and the Design Element Section 8.2 – Public Realm and Public Facilities.	-
Policy F-13 New Sidewalks	This section has been updated. Sidewalks are covered in Section 6.4.	-
Policy F-14 Street Trees	Same as references for Policy F-12 above.	-
Policy F-15 Undergrounding of Utilities	This section has been updated and is found in the Design Element. See Policy 8.2.7.	Provides up-to-date information.
Table F-1 Imperial Beach School Date, 1993	Section 6.5 – Schools. Edits to update baseline facilities information.	Provides up-to-date information.
Policy F-16 Elementary School Sites	Section 6.5 – Schools. Edits to update baseline facilities information.	Provides up-to-date information.
Policy F-17 Otay High School	Section 6.5 – Schools. Edits to update baseline facilities information.	Provides up-to-date information.
Policy F-18 Joint Use of Schools	Section 6.5 – Schools. Updated to reflect existing conditions.	Provides up-to-date information.
Policy F-19 Recycling and Source Reductions	Section 6.6 Solid Waste Disposal. Maintains existing policy and adds policies to address composting.	Supports proposed Climate Action Plan.
Policy F-20 Sewage Capacity	Section 6.7 Wastewater Facilities Edits to update baseline facilities information.	Provides up-to-date information.
Policy F-21 Mexico Sewage Issues	See Conservation and Ecotourism Element Section 4.4 – Water Quality. Updates and expands policy consistent with Municipal Separate Storm Sewer System Permit (MS4). Adds text related to binational pollution.	Implements the MS4 permit.
Policy F-22 Upgrade Systems	Section 6.7 Wastewater Facilities Edits to update baseline facilities information.	Provides up-to-date information.
Policy F-23 Water Conservation	Section 6.8 Water Services Forthcoming edits to update baseline facilities information and conservation measures derived from the Urban Water Management Plan.	Will provide up-to-date information.

Safety Element

Existing – Safety Element	New Approach – Safety Element	Rationale and Coastal Act Consistency
Figure S-1 100 Year Flood Plain	Figure S-1A 100-Year Flood Plain updated in GIS Figure S-1B 100-Year Flood Plain – Port District	Provides up-to-date information
Figure S-2 Geology	Figure S-2 Geology updated in GIS	Provides up-to-date information.
Figure S-3 Soils	Figure S-3 Soils updated in GIS	Provides up-to-date information.
Goal 15 Safety Protection	Expanded goal to cover reducing risks from climate change.	Coastal Act Section 30253 Meets objective of LCP update to improve resiliency.
Goal 16 Shoreline Protection	Maintained policy with wording edits.	Coastal Act Section 30235
-	New goal for increased disaster preparedness and resiliency through regional collaboration.	Meets objective of LCP update to improve resiliency.
-	New discussion text on sea level rise assessment and adaptation strategies under consideration. Managed retreat is not included in the draft General Plan and is not being pursued.	Meets objective of LCP update to improve SLR resiliency. Considers Coastal Commission Sea Level Rise Policy Guidance and LCP Update Guide on coastal hazards.
-	Section 7.1 – Sea Level Monitoring, Planning, and Adaptation Calls for a data-driven monitoring approach, including gathering data from residents' experiences. Includes a subsection on the need for coordination and collaboration with other agencies.	Recommends sea level rise adaptation strategies. Collaboration and coordination is necessary for systems-level solutions to complex problems. Tailored adaptive management approach. Addresses environment, economic and community values.
-	Section 7.2 – Shoreline Protection/Coastal Hazards & Sea Level Rise Response Existing protective devices to be maintained.	Meets objective of LCP update to improve resiliency. Integrates components of Coastal Commission Sea Level Rise Policy Guidance and LCP Update Guide on coastal hazards.
Policy S-1 Technical Studies	Section 7.3 Geological and Seismic Hazards	-
Policy S-2 Leave Hazardous Areas Underdeveloped	Section 7.1 – Sea Level Rise Monitoring, Planning, and Adaptation, see section on <i>Development Design and Siting</i> ; and Section 7.4 Disaster Preparedness. Policy replaced with a suite of policies addressing the issue comprehensively	Tailored adaptive management approach. Addresses environmental, economic and social values.
Policy S-3 Floodplains In Open Space	Policy deleted in Safety Element. Issue is addressed in the Land Use Element with a proposal to re-designate Salt Pond 10a from Urban Reserve to Open Space.	Land Use Element is where the General Plan addresses land use designations.
Policy S-4 High Risk Areas	Policy 7.1.26 – policy expanded to cover resiliency.	Collaborate with SANDAG and other agencies/institutions to use best available data for beach width/sand volume monitoring

Existing – Safety Element	New Approach – Safety Element	Rationale and Coastal Act Consistency
-	7.2 Fire Hazards section added. Includes new policies for fire prevention and safety.	State law requires cities to update their general plan safety elements to address the risk of fire.
Policy S-5 Construction Near Fault Traces	Section 7.3 Geological and Seismic Hazards See Policy 7.3.1- minor wording edits to policy.	-
Policy S-6 Cliff Top Development	Policy deleted, replaced with Section 7.1 – Sea Level Rise Monitoring, Planning, and Adaptation, (see <i>Development Design and Siting</i> policies)	Addresses hazards and resiliency more comprehensively.
Policy S-7 Flood Control Program	Section 7.1 – Sea Level Rise Monitoring, Planning, and Adaptation, see <i>Flooding</i> policies.	Helps meet LCP goal of increasing resiliency.
Policy S-8 Disaster Preparedness	Section 7.4 Disaster Preparedness Policy updated and expanded to align with the San Diego County Multi-Jurisdictional Local Hazard Mitigation Plan.	Helps meet LCP goal of increasing resiliency. Aligned with Federal Emergency Management Agency – mandated hazard mitigation planning.
Policy S-9 Public Education	Policy edited but core content maintained. See 7.4.8.	-
Policy S-10 Regulate Shoreline Land Use and Development	Section 7.1 – Sea Level Rise Monitoring, Planning, and Adaptation. Contains a suite of policies which update and expand upon this topic.	Collaborate with SANDAG and other agencies/institutions to use best available data for beach width/sand volume monitoring.
S-11 Storm Waves, Flooding and Seacliff Erosion	Section 7.1 – Sea Level Rise Monitoring, Planning, and Adaptation, see <i>Shoreline Protection Devices</i> policies. Ordinance language is preserved, with edits for clarity, and expansion of vertical seawall requirements if necessary for protection to the broader shoreline rather than just north of Imperial Beach Blvd. See Policy 7.1.8 regarding beach width.	Seek to maintain walkable beach except for temporary loss during storms/extreme high tides Evaluate adaptation strategies based on economic, environmental, and social impacts.

Design Element

Existing – Design Element	New Approach – Design Element	Rationale and Coastal Act Consistency
-	Figure D-1 added to show public coastal view corridors	Coastal Act Section 30251 requires that development be sited and designed to protect views to and along the ocean and other scenic coastal areas.
Figure D-1 Functional Areas	Figure D-2 Functional Areas	-
Goal 4 Visual Quality Is Important	Maintains goal content with some wording edits. Added goals for: preservation of small beach-town character, preservation of public views, and a City designed for walkability, sustainability, and resiliency.	Coastal Act Sections: 30251;30253 Support implementation of new state laws and General Plan Update theme of working toward environmental, economic and community goals.
Policy D-1 Design Review	Policy slightly edited but core content maintained. See Policy 8.1.8	-

Existing – Design Element	New Approach – Design Element	Rationale and Coastal Act Consistency
Policy D-2 Design Guidelines	Policy slightly edited but core content maintained. See Policy 8.1.7	-
-	Section 8.2 – Public Realm and Public Facilities Added policies focusing on civic architecture and public spaces, the “Tree-Covered City Image,” revitalization, and signs.	Emphasizes importance of the public realm.
Policy D-3 Sign Program	Policy maintained, and subsections added to provide more details. See Policy 8.2.12	-
Policy D-4 City Image	Removed reference to City maintaining low profile and replaced with language within design guidelines section to promote harmonious development design. Language related to trees maintained and updated. Combined with original Policy D-6 Trees. See policies 8.2.3-8.2.5.	Modernizes language, updates policies and approach consistent with General Plan Update theme of working toward environmental, economic and community goals.
Policy D-5 Public Utilities and Facilities	Policy language slightly edited but core content maintained and split into two policies. See Policies 8.2.5 and 8.2.6	-
-	Added new policies on civic architecture and public spaces. See policies 8.2.1 and 8.2.2	Emphasizes importance of the public realm.
Policy D-6 Trees	Language edited but core content remains. See policies 8.2.3 and 8.2.4	-
Policy D-7 Signs	See Section 8.2, Public Realm and Public Facilities, subsection “Signs.” Language updated, and core content maintained. See Policies 8.2.10-8.2.14.	Policies support signage in keeping with the desired City image. City Code enforcement conducts monitoring efforts as needed/reported for follow up.
Policy D-8 Project Design	Policy broken up into multiple policies and grouped together under four categories: Citywide Design and Coastal Views, Review Process, Residential Development, and Commercial and Mixed-Use Design. See policies 8.1.3 – 8.1.6 Added policies for coastal views. See policies and sustainable development near environmentally sensitive habitat areas. See policies 8.1.1 and 8.1.2.	Coastal Act Section 30251. Support implementation of Coastal Act and General Plan Update theme of working toward environmental, economic and community goals.
Policy D-9 Commercial/Mixed-Use Zones Design Guidelines	Adds goals and policies for commercial and mixed use. See policies 8.1.13 – 8.1.19. In addition, the City proposes producing an illustrative graphic design manual to supplement its 1984 Design Guidelines, as a future work program item.	-

Existing – Design Element	New Approach – Design Element	Rationale and Coastal Act Consistency
Policy D-11 Permanent Open Space Areas	This section has been updated. See Mobility Element, Section 3.3 Bicycle Mobility for language which emphasizes bikeways that connect to public areas and parks. See Section 8.1 Community Design Character for language regarding integrating open space into developments.	-
Policy D-12 Highways	This section has been updated. See Mobility Element, Section 3.1 Street System for policies related to highways and roads specifically. See Design Section 8.2 - Public Realm and Public Facilities, subsection on Tree-Covered City Image, for policies related to trees along roadways.	-
-	Section 8.3 - Sustainable Coastal Development Added policies for sustainable coastal development.	Ties in to cross-cutting theme of environment, economy and community. Identifies role of incremental upgrades through building code requirements

ATTACHMENT 3

**LOCAL COASTAL PROGRAM
IMPLEMENTATION PLAN
ZONING ORDINANCE REVISIONS**

City of Imperial Beach

Local Coastal Program Implementation Plan/Zoning Ordinance Revisions

This attachment shows in track changes (strikeout/underline) proposed revisions to Title 18 and 19 of the Municipal Code. Text not in track changes is original text with no proposed changes but provided for context.

Bullets shown with “...” indicate additional unchanged text not shown.

IMPERIAL BEACH ZONING ORDINANCE ¹

MUNICIPAL CODE TITLE 18

CHAPTER 18.16 MAJOR SUBDIVISIONS- DESIGN AND IMPROVEMENT REQUIREMENTS

18.16.160. Office, commercial, and industrial zones.

If the subdivision is located in an office, commercial, or industrial zone district (~~BPO, C-1, C-T, or M-1~~), the following improvements shall be required:

A. ...²

MUNICIPAL CODE TITLE 19

CHAPTER 19.04 DEFINITIONS

19.04.021. Addition of Permitted Use.

Uses not identified in the underlying zone district that do not increase the impacts of any use, either permitted or conditional. The Addition of a Permitted Use conditional use permit process is intended to allow for consideration of unforeseen uses and unique circumstances on specific parcels with evaluation based on the context of the surrounding area. The process allows for consideration of emerging issues, site attributes or changed conditions within the neighborhood surrounding and including the subject property. For residential neighborhoods, land use flexibility should be balanced with the existing residential character. Projects should continue to meet the objectives of any applicable zoning district. The process encourages dialogue and collaboration among applicants, affected property owners, neighbors and the City.

CHAPTER 19.12 R-1-6000 SINGLE-FAMILY RESIDENTIAL ZONE

19.12.020. Permitted Uses

A.

B. The following uses are permitted in the R-1-6000 zone subject to the approval of a conditional use permit:

1. Churches;
2. Day care centers;
3. Library;
4. Mobile home parks;
5. Parks;
6. Senior housing as permitted in Chapter 19.67;
7. Schools;

8. Wireless communications facilities, when necessity compels placement to avoid a significant gap in wireless communications coverage. (Ord. 2002-983 § 9, 2002; Ord. 94-884)

¹ This attachment shows in track changes (strikeout/underline) proposed revisions to Title 18 and 19 of the Municipal Code. Text not in track changes is original text with no proposed changes but provided for context.

² Bullets shown with “...” indicate additional unchanged text not shown.

9. Addition of Permitted Use (see definition)

CHAPTER 19.13 R-1-3800 SINGLE-FAMILY RESIDENTIAL ZONE

19.13.020. Permitted Uses

The following uses are permitted in the R-1-3800 zone:

- A. One single-family detached dwelling per lot;
- B.

The following uses are permitted in the R-1-3800 zone subject to the approval of a conditional use permit:

- A. Churches;
- B. Day care center;
- C. Library;
- D. Mobile home parks;
- E. Parks;
- F. Senior housing as permitted in Chapter 19.67;
- G. Schools;
- H. Wireless communications facilities, when necessity compels placement to avoid a significant gap in wireless communications coverage. (Ord. 2002-983 § 10, 2002; Ord. 94-884)

I. Addition of a Permitted Use (see definition)

19.13.030. Yards

Yard requirements for the R-1 zone are as follows:

- A. Front Yard. There shall be a minimum front yard of fifteen feet, provided that the front of a garage shall be set back a minimum of twenty feet.
- B. Side Yard. There shall be a minimum side yard of five feet ~~if on an alley and ten feet if no alley.~~
- C. Rear Yard. There shall be a minimum rear yard five feet if on an alley and of ten feet if no alley.
- D. Street Side Yard. There shall be a minimum street side yard of ten feet. (Ord. 94-884; Ord. 601 § 1, 1983)

CHAPTER 19.14 R-1-3000-D TWO-FAMILY DETACHED RESIDENTIAL ZONE

19.14.020. Permitted Uses

A. The following uses are permitted in the R-3000-D zone, provided that all projects containing two to four units shall be subject to the approval of a site plan review by the community development department and five or more units shall be subject to the approval of a site plan review by the planning commission:

- 1. Single-family detached dwellings;
- 2. ~~.....~~

B. The following uses are permitted in the R-1-3000-D zone subject to the approval of a conditional use permit:

1. Churches;
2. Day care centers;
3. Library;
4. Mobile home parks;
5. Parks;
6. Senior housing as permitted in Chapter 19.67;
7. Schools;
8. Wireless communications facilities, when necessity compels placement to avoid a significant gap in wireless communications coverage. (Ord. 2002-983 §§ 11, 12, 2002; Ord. 97-917 § 2, 1997; Ord. 94-884)

9. [Addition of a Permitted Use \(see definition\)](#)

CHAPTER 19.15 R-3000 TWO-FAMILY RESIDENTIAL ZONE

19.15.020. Permitted Uses

A. The following uses are permitted in the R-3000 zone, provided that all projects containing two to four units shall be subject to the approval of a site plan review by the community development department and five or more units shall be subject to the approval of a site plan review by the planning commission:

1. Detached or attached residential dwelling units;
2.

B. The following uses are permitted in the R-3000 zone subject to the approval of a conditional use permit:

1. Churches;
2. Day care centers;
3. Library;
4. Mobile home parks;
5. Parks;
6. Senior housing as permitted in Chapter 19.67;
7. Schools;
8. Wireless communications facilities, when necessity compels placement to avoid a significant gap in wireless communications coverage. (Ord. 2002-983 §§ 13, 14, 2002; Ord. 97-917 § 2, 1997; Ord. 94-884)

9. [Addition of a Permitted Use \(see definition\)](#)

CHAPTER 19.16 R-2000 MEDIUM DENSITY RESIDENTIAL ZONE

19.16.020. Permitted Uses

A. The following uses are permitted in the R-2000 zone, provided that all projects containing two or more units shall be subject to the approval of a site plan review by the community development department and five or more units shall be subject to the approval of a site plan review by the planning commission:

1. Detached or attached residential dwelling units;
2.

B. The following uses are permitted in the R-2000 zone subject to the approval of a conditional use permit:

1. Churches;
2. Day care centers;
3. Library;
4. Mobile home parks;
5. Parks;
6. Senior housing as permitted in Chapter 19.67;
7. Schools;
8. Wireless communications facilities, when necessity compels placement to avoid a significant gap in wireless communications coverage. (Ord. 2002-983 §§ 15, 16, 2002; Ord. 97-917 § 2, 1997; Ord. 94-884)

[9. Addition of a Permitted Use \(see definition\)](#)

CHAPTER 19.17 R-1500 HIGH DENSITY RESIDENTIAL ZONE

19.17.020. Permitted Uses

A. The following uses are permitted in the R-1500 zone, provided that all projects containing two to four units shall be subject to the approval of a site plan review by the community development department and five or more units shall be subject to the approval of a site plan review by the planning commission:

1. Detached or attached residential dwelling units;
2.

B. The following uses are permitted in the R-1500 zone subject to the approval of a conditional use permit:

1. Churches;
2. Day care centers;
3. Library;
4. Mobile home parks;
5. Parks;
6. Senior housing as permitted in Chapter 19.67;
7. Schools;
8. Wireless communications facilities, when necessity compels placement to avoid a significant gap in wireless communications coverage.

[9. Addition of a Permitted Use \(see definition\)](#)

C. Short-term rentals to which all of the following apply are permitted in the R-1500 zone until January 1, 2007;

1.

CHAPTER 19.23. COMMERCIAL/ MIXED-USE USE REGULATION

19.23.010. Land use table.

The following land uses are allowed in the C/MU-1, C/MU-2, and C/MU-3 zones as uses that are expressly permitted, uses that require a conditional use permit, or uses that are permitted only if in compliance with specific location requirements. Any use not listed is prohibited unless the City Council determines it to be compatible with the zone.

Key to Land Use Tables

P	Expressly permitted
C	Permitted with conditional use permit
N	Not permitted

Notes: Per the City’s zoning code, hotels consist of various types and are defined as follows:

- H- 1 A site area of a minimum of thirty-five thousand square feet; at least thirty guest rooms; facilities for conference, meeting, or public use; and a full-service restaurant on-site.
- H- 2 A “motel,” which is an establishment providing guest rooms, for periods less than thirty days, with most rooms gaining access from an exterior walkway.
- H- 3 A lot, parcel, or segment of real property dedicated to “timeshare units,” as defined in Section 19.04.756 of the Imperial Beach Municipal Code.
- H- 4 A “bed and breakfast” lodging place containing no more than six guest rooms and one kitchen.
- H- 5 An “inn” means a commercial establishment that affords public lodging to travelers, for periods less than thirty days. A kitchen and dining area may also be included to provide meal and beverage service to guests and to the general public.

	C/MU-1	C/MU-2	C/MU-3	Notes
Commercial Uses				
Adult bookstore, adult hotel/motel, adult mini-motion picture theater, adult motion picture arcade, adult motion picture theater, sexual encounter studio, rap parlor, model studio	P	N	N	See definitions. Subject to requirements for adult-oriented businesses in Chapter 19.60.
Antique store	P	P	P	See definition.
Arcades and game centers	C	C	C	See definition.
Art studio, gallery, museum	P	P	P	See definition.
Athletic and health clubs	P	P	P	See definition.
Bars or cocktail lounges	C	C	N	See definition.
with live entertainment	C	C	N	See definition.

	C/MU-1	C/MU-2	C/MU-3	Notes
Beach equipment rental, bike rental, surf shop, fishing supply	P	P	N	
Body piercing establishment	C	N	N	See definition. Subject to Section 19.26.020(B)(1).
Bookstore	P	P	P	
Boutique	P	P	P	
Cabaret	C	N	N	See definition. Subject to Chapter 19.60.
Campsites	C	N	N	See definition.
Cannabis permitted use	P	N	N	See definition and number allowed in Chapter 4.60. Subject to the requirements of Chapters 19.61 and 4.60.
Child day care center	P	P	P	See definition.
Clinic	P	P	P	See definition.
Dancehall	C	N	N	See definition. Subject to Chapter 19.60.
Department store	P	N	N	
Drive-in restaurant	P	P	N	See definition.
Drive-through establishment	C	N	C	See definition.
Fortune telling establishment	C	N	N	See definition. Subject to Section 19.26.020(B)(3).
Hostel	C	C	N	See definition.
Kennel	C	N	N	See definition. Subject to Section 19.74.050.
Kiosk	P	P	P	See definition. In C/MU-2: Subject to Section 19.27.020(A)(2).
Liquor store	C	C	N	See definition.
Massage therapy establishment	P	P	P	See definition. Per Senate Bill 731.
Mortuary	C	N	N	
Motor vehicle sales	C	N	N	Subject to Section 19.74.070.
Palm reading establishment	C	N	N	See definition. Subject to Section 19.26.020(B)(3).
Pawnshop	C	N	C	See definition.
Personal convenience services	P	P	P	See definition.

	C/MU-1	C/MU-2	C/MU-3	Notes
Pool or billiard hall	C	C	N	See definition.
with live entertainment	C	C	N	See definition.
Postal services, private	P	P	P	
Professional offices, financial institutions, and real estate	P	P	P	
Restaurant	P	P	P	See definition.
with live entertainment	C	C	C	See definition.
Retail food store	P	P	P	
Retail sales	P	P	P	See definition.
Sales of secondhand or used merchandise	N	N	N	See definition and Section 19.74.100.
Single-family detached	N	N*	N	*Only permitted in Seacoast Mixed-Use/Residential Overlay Zone.
Tattoo establishment	C	N	N	See definition. Subject to Section 19.26.020(B)(4).
Residential and Similar Uses				
Accessory building, structures, private garages	C	C	C	See definition of accessory building.
Boarding house	C	N	N	See definition.
Emergency shelter	P	N	N	See definition.
Hostel	N	C	N	See definition.
Hotel, motel, bed and breakfast lodging, inn (H-1, H-2, H-3, H4, H-5)	P	P	P	See definitions above.
Live/work unit	P	P	P	See definition.
Mixed-use development	P	P	P	See definition.
Motor home/manufactured housing community	N	N	N	See definitions.
Multiple-family dwellings	P	P	P	See definition. See requirement for active commercial uses on ground floor per Sections 19.26.020(A)(1), 19.27.020(A)(1), 19.28.020(A)(1).
Second-family units	N	N	N	
Senior housing, nursing home, retirement home	C	C	C	See definitions.

	C/MU-1	C/MU-2	C/MU-3	Notes
Short-term rental	P	P	P	See definition.
Single-family detached	N	N*	N	*Only permitted in Seacoast Residential Overlay Zone.
Single-room occupancy units	C	N	N	
Timeshare	C	C	N	See definition.
Light Industrial Uses				
Automobile dismantling or wrecking yard	N	N	N	See definition.
Automobile repair or automobile body shop	C	N	N	See definitions.
Automobile sales lot	C	N	N	See definition.
Automobile service station/gas station	C	N	C	See definition.
Energy facility	C	N	N	See definition.
Equipment rental yard	C	N	N	
Incidental manufacturing	C	C	C	See definition.
Light manufacturing, manufacturing, industrial	N	N	N	
Public and Semi-Public Uses				
Campsites	N	N	N	See definition.
Clubs, fraternal/veteran/service organizations	C	C	C	Subject to Sections 19.26.020(B)(2), 19.27.020(A)(3), 19.28.020(A)(2).
with live entertainment	C	C	C	
Educational institutions	C	C	N	
Governmental or quasi-public building	P	P	P	
Library	P	P	P	
Religious assembly	C	C	C	See definition. Subject to Sections 19.26.020(B)(2), 19.27.020(A)(3), 19.28.020(A)(2).
Public parking lot	P	P	P	
Theatre/assembly	C	C	C	
Wireless communication facility	C	C	C	See definition. Subject to Chapter 19.90.

	C/MU-1	C/MU-2	C/MU-3	Notes
Green Building Utilities				
Green building utilities	P	P	P	See definition. Subject to Chapter 19.92.
Open Space and Recreation				
Passive public parks	P	P	P	
Playground and recreation areas	C	C	C	Permitted if incidental and accessory to a permitted use.
Public riding and hiking trails	P	P	P	

(Ord. 2018-1174 § 4; Ord. 2016-1155 § 5; Ord. 2013-1140 § 1; Ord. 2012-1130 § 1)

CHAPTER 19.25 C/R-ET COMMERCIAL/ RECREATIONAL ECOTOURISM ZONE

19.25.010. Purpose of zone.

The purpose of the C/R-ET zone is to provide land to meet the demand for goods and services required primarily by the recreation and ecotourist visitor. This zone is intended to implement the recommendations of the 2005 Urban Waterfront and Ecotourism Study. It would also [help](#) implement ~~Parks and Recreation~~[the Conservation and Ecotourism](#) Element ~~Policy P-7~~ of the General Plan. ~~(Increase Tourist Related Commercial Land Uses) which provides that "The City and its business community should take direct action to increase the amount of tourist-oriented businesses both along the beachfront, South San Diego Bayfront and inland areas."~~

CHAPTER 19.26 C/MU-1 GENERAL COMMERCIAL AND MIXED-USE ZONE

19.26.020. Permitted Uses

A. Specified commercial, residential, light industrial, public and semi-public, green building utilities, and open space and recreation uses allowed in the C/MU-1 zone are listed in Chapter 19.23, including those requiring a conditional use permit, and shall also comply with the following land use regulations:

1. For all buildings with frontage along Palm Avenue, including those with multiple-family dwelling units, "active commercial uses" as defined in Chapter 19.05-04 are required to be provided at a minimum of sixty percent of each building's ground floor lineal footage, have direct pedestrian access from the Palm Avenue sidewalk or a plaza, and have a minimum building depth of twenty-five feet. The remaining forty percent must either be primarily related to the commercial use, such as parking, access, or other non-active commercial purpose or, if related to non-commercial use, must be designed either to encourage and promote pedestrian activity or to visually screen required on-site parking.

2.

CHAPTER 19.27 C/MU-2 SEACOAST COMMERCIAL AND MIXED-USE ZONE

19.27.020. Permitted Uses

A. Specified commercial, residential, light industrial, public and semi-public, green building utilities, and open space and recreation uses allowed in the C/MU-2 zone are listed in Chapter 19.23, including those requiring a conditional use permit, and shall also comply with the following land use regulations:

1. For all buildings with frontage along Seacoast Drive and/or Palm Avenue, including those with multiple-family dwelling units, “active commercial uses” as defined in Chapter 19.04 are required to be provided at a minimum sixty percent of each building’s ground floor lineal footage and have direct pedestrian access from the Seacoast Drive and/or Palm Avenue sidewalk or a plaza. The remaining forty percent must either be primarily related to the commercial use, such as parking, access, or other non-active commercial purpose or, if related to non-commercial use, must be designed either to encourage and promote pedestrian activity or to visually screen required on-site parking.

2...

5. Multiple-family residential dwelling units are permitted at a maximum density of one unit per every one thousand five hundred gross square feet of lot area, ~~except that~~ Exclusively residential developments are required to comply with the development standards of the R-1500 (High Density Residential) Zoning District; ~~or~~ if a mixed-use project is located on the east side of Seacoast Drive or on Palm Avenue, ~~east of Seacoast Drive~~, residential dwelling units may be increased to a maximum density of one dwelling unit for each one thousand two hundred ten gross square feet of lot area with approval of a conditional use permit by the City Council that demonstrates compliance with ~~two or more of~~ the following development incentives:

~~a. Project sites that are consolidated to a final size greater than twenty thousand square feet;~~

~~a.~~ The eEntire project achieves Leadership in Energy and Environmental Design (LEED) Green Building Rating System certification, a comparable green building certification, or can demonstrate the ability to achieve certification; AND

b. A site-specific parking study shall be provided taking into account the demand for parking associated with primary and ancillary uses for the project, transportation demand management strategies, and neighborhood context; AND

c. Include a list of requested modifications, density bonuses, exceptions, variances, and alternatives together with a narrative of how the community will benefit from the modifications; AND

d. Two or more of the following:

i. At the sole discretion of the City Council, project sites that are consolidated to a final size greater than twenty thousand square feet are eligible for the density or height increase identified in item 5 of this section;

ii.e. The eEntire project provides a minimum of seventy-five percent “active commercial uses” on the ground floor;

~~d. At least twenty-five percent of proposed residential units must be three-bedroom units;~~iii.e. Provision~~de an additional one hundred square feet~~ of common open space or plaza space equal to three percent of the total lot area using one of the following methods: with minimum dimensions of six feet by ten feet;

- Provisions of wider sidewalks and public space along major roadways and pedestrian facilities.
- Outdoor eating or shopping space.
- Landscaping, pocket parks, or other usable public space.

~~f. Dedicate a minimum of one foot of private property frontage to public use (creates a one-foot front setback dedicated to public use);~~

~~g.iv. Floors Provisions of above first floor provide additional setback of equal to five feet beyond required setback on the second story and an additional five feet for the third story, if applicable.~~

B. Site plan review by the City Council will be required if any of the following applies for proposed uses located in the C/MU-2 zone:

1. All proposed developments involving new construction;
2. Any addition, construction, remodeling or alteration of existing buildings resulting in an increase of ten percent or greater of the gross floor area of a commercial structure or in an individual commercial space within the structure or within a commercial shopping center;
3. Any proposed commercial use, residential use, or structure requiring the approval of a conditional use permit;
4. Any development including residential dwelling units; and
5. Public parking lots.

C. ...

19.27.70. Building Height

A. No building in the C/MU-2 (Seacoast Commercial) zone shall exceed three stories or thirty feet in height, whichever is less, except as follows:

1. Exclusively residential uses Properties within the Seacoast Residential Overlay Zone are subject to a reduced ~~single-family residential~~ building height of two stories or twenty-six feet, whichever is less, per Section 19.27.140(C);

2. Properties east of Seacoast Drive that do not provide exclusively residential uses shall have a height limit not to exceed three stories and thirty five feet with approval of a conditional use permit that demonstrates compliance with the criteria listed in item 5 of this section unless otherwise noted herein following:

~~a. Side yard setbacks and/or stepbacks have been incorporated into the project to protect street end public views towards the ocean;~~

~~b. Two or more of the development incentives listed in Section 19.27.020(A)(5); and~~

3. Hotel, as defined in Section 19.04.410 as an H-1 type hotel, shall have a height limit not to exceed forty feet as part of an approved Specific Plan pursuant to Section 19.27.150.

B. All commercial spaces on the ground floor shall have a minimum ~~fifteen-foot~~ thirteen-foot, six-inch floor-to-ceiling height; and single-story commercial buildings shall have a minimum building height of twenty feet. (Ord. 2017-1161 § 1; Ord. 2013-1140 § 1; Ord. 2012-1130 § 1; Ord. 2003-1007 § 2; Ord. 94-884)

19.27.140. Seacoast Commercial Mixed-use/Residential Overlay Zone.

The area located between Ocean Boulevard on the west, Ocean Lane on the east, and between Imperial Beach Boulevard on the south and Palm Avenue on the north is designated as the Seacoast Mixed-Use Residential Overlay Zone. The purpose of this transition zone is to allow for the gradual commercial expansion in an area which is generally used for residential purposes while preserving opportunities for the continuation of single-family residential uses.

A.

C. Height requirements in the Seacoast Residential Overlay Zone are as follows:

1. ~~Single-family~~ Exclusively residential uses. Two stories or twenty-six feet, whichever is less.

2. All other uses. As permitted per Section 19.27.070. (Ord. 2013-1140 § 1; Ord. 2012-1130 § 1; Ord. 2003-1013 §§ 6, 7; Ord. 94-884)

19.27.150. Specific plan.

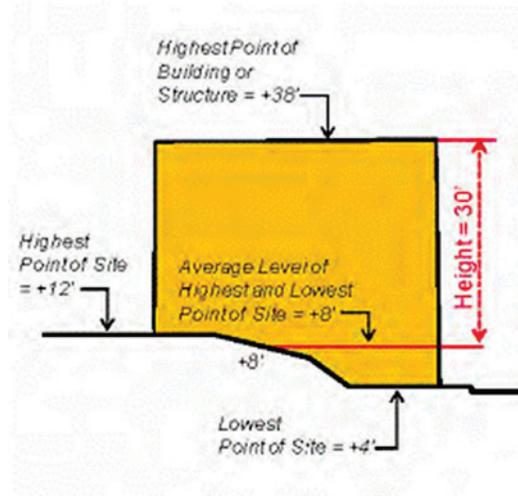
A. The City Council may approve a specific plan for an H-1 hotel as defined in Chapter 19.25-04 of this code that allows deviations from the following regulations in the C/MU-2 zone:

....
CHAPTER 19.40 BUILDING HEIGHT

19.40.030. Measurement of height.

~~Height shall be measured from existing grade at all points of the site to a warped plane an equal height above all points on the site. (Ord. 94-884)~~

Height shall be measured from the average level of the highest and lowest point of that portion of the building site (at existing grade) covered by the building or structure to the highest point of the building or structure.



(Ord. 2013-1140 § 1; Ord. 2012-1130 § 1; Ord. 94-884)

CHAPTER 19.44 CURB CUTS

19.44.20. Access

A. No parking area in the C/MU-1, C/MU-2, or C/MU-3 zone shall be located so as to require or encourage the backing of automobiles or other vehicles across any street lot line to effect egress from the place of parking.

B. Parking areas in R zones shall meet the following standard:

1. Where properties abut both an alley and a street designed as a collector, major, or prime arterial, no new street curb cuts or parking layouts requiring backing into the street shall be allowed.

2. Where properties abut both a collector, major, or prime arterial and a local street, access shall be taken only from the local street.

3. Properties abutting both an alley and residential street shall take access from the alley with the exception that one sixteen-foot-wide curb cut allowing no more than two vehicles to back into the street may be allowed. (Ord. 2012-1130 § 1; Ord. 94-884)

C. Driveways for corner properties on arterials or collectors shall be located as far away from the intersection as possible as determined by the Community Development Director and the City Engineer.

19.44.30. Separation

A. Curb cuts shall be not less than four feet apart, nor less than two feet from the prolongation of a side lot line. (Ord. 601 § 1, 1983; Ord. 94-884)

B. Driveways for corner properties on arterials or collectors shall be located as far away from the intersection as possible, the location of which is subject to the review and approval of the community development director and the city engineer. Joint access driveways shared by abutting uses shall be encouraged.

CHAPTER 19.48 OFF-STREET PARKING

19.48.020. Requirements generally- Existing buildings and additions.

A. The parking requirements of this chapter shall be observed only for proposed uses or developments requiring site plan review by the City Council ~~or Community Development Director~~ as identified in Chapters 19.26, 19.27, and 19.28, provided that in no case shall the number of existing parking spaces be reduced and that any new and all existing parking spaces shall be permanently available and be permanently maintained for parking purposes.

19.48.035. Required spaces for mixed-use projects in the C/MU-1, C/MU-2, and C/MU-3 zones.

For new development or expansion of existing structures designed to accommodate a variety of shops, stores, offices, restaurants, personal convenience services, and athletic and health clubs in the C/MU-1, C/MU-2, and C/MU-3 zones, off-street parking shall be provided in accordance with the standard listed in the following table. During site plan review, the City would determine whether the standard for required parking could be reduced based on the types of proposed land uses and existing land use, and the availability of parking (both private and public parking) in the project area. Shared parking shall be permitted and shall only be approved when technical evidence is presented to justify the shared use. The Urban Land Institute Guidebook Shared Parking Second Edition (2005) shall be used as a guideline and supplemented by additional findings, where appropriate.

Zone/Land Use	Standard	25% Reduction for Vertical Mixed-Use <u>(Conditional Use Permit required – See IBMC 19.48.050.K)</u>	Eligible for Waiver for Commercial Uses Less Than 1,000 SF	Eligible for Additional Parking Reduction for Shared Parking
C/MU-1 and C/MU-3	1 space per 500 gross SF of commercial	X	X	X
C/MU-2	1 space per 1,000 gross SF of commercial	X	X	X
Multiple-family residential	1.5 spaces per dwelling unit	X		X
Hotel without cooking facilities	1 space per guest room	X		
Hotel with cooking facilities	1.5 spaces per guest room	X		

(Ord. 2013-1140 § 1; Ord. 2012-1130 § 1)

19.48.050. Required spaces- Stand-alone commercial and other uses.

The number of required off-street parking spaces for commercial and other uses shall be as follows:

A. ...

K. For vertical mixed-use development ~~of multiple-family residential over commercial use~~, required parking may be reduced by up to twenty-five percent with approval of a conditional use permit. Any request for a parking reduction shall be accompanied by a site-specific parking study, taking into account the demand for parking associated with primary and ancillary uses for the project, transportation demand management strategies, and neighborhood context.

(Ord. 2013-1140 § 1; Ord. 2012-1130 § 1; Ord. 2005-1032 § 3; Ord. 2001-960 § 19; Ord. 94-888 § 3; Ord. 94-884; Ord. 640 § 1, 1984; Ord. 635 § 3, 1984; Ord. 601 § 1, 1983)

CHAPTER 19.50 OPEN SPACE AND LANDSCAPING

19.50.030. Commercial landscaping

A. Not less than fifteen percent of the total site shall be landscaped and permanently maintained.

B.

H. One tree is required per dwelling unit and one tree per every 3 parking spaces. The trees may be provided on or off site.

I. Tree planting should not locate where visibility or other safety issues may occur, as determined by the Community Development Director.

J. Existing trees shall remain unless removal is authorized by the City.

19.50.050. Residential landscaping

A. Not less than fifty percent of the required front yard and street side yard setbacks shall be landscaped and permanently maintained. The remainder of the required yard may be used for driveways and walkways.

B. Landscaping shall be provided within the parking area or immediately abutting it.

C. There shall be a minimum four-foot landscaped area between the structure and any parking located in front of the structure.

D. There shall be a minimum three-foot-wide landscaped area between the parking area and each side lot line when parking is located between the structure and the street.

E. Prior to issuance of any building permit, a complete landscaping plan shall be submitted to the Community Development Department for approval. Such approval shall be subject to appeal in the manner set forth in Sections 19.84.070 through 19.84.090.

F. Landscaping and required watering system shall be installed prior to the use of the premises. All landscaping material in required landscaping areas shall be permanently maintained in a growing and healthy condition, including trimming, as appropriate to the landscaping material.

G. A permanent irrigation system shall be installed to serve all landscaped areas. (Ord. 94-884; Ord. 723 § 5, 1987; Ord. 635 § 9, 1984; Ord. 601 § 1, 1983)

H. Within the street front yard or street side yard setbacks, for each 50 feet of frontage or increment thereof, there shall be provided at least one 20" box tree.

I. Tree planting should not locate where visibility or other safety issues may occur, as determined by the Community Development Director.

J. Existing trees shall remain unless removal is authorized by the City.

CHAPTER 19.81 SITE PLAN REVIEW

19.81.070. Plans and information requirements.

A. Plot Plan. The plot plan shall indicate:

1. Location of buildings and structures, both existing and proposed;

2. Location of off-street parking and loading facilities;

3. Location and dimensions of present and proposed street and highway dedications required to handle the traffic generated by the proposed uses. Where denoted in the ~~circulation~~ mobility element of the general plan, street ending design shall be provided in accordance with the city's adopted street-ending improvement policy;

4...

CHAPTER 19.84 VARIANCES

19.84.150. Administrative adjustments

The Community Development Department shall be authorized to grant an adjustment of up to ten percent of any development standard listed in this code, excluding density, parking and any height requirements. The purpose and intent of this Section is to address necessary minor adjustments that would not have a significant impact on the project or the community. These adjustments must not materially violate any provision of this Title.-(Ord. 94-884, 1994)

ATTACHMENT 4

**PUBLIC REVIEW PERIOD COMMENTS AND RESPONSES TO
COMMENTS**

Appendix 4 Response to Public Comments

LETTER A



Southwest Wetlands Interpretive Association
700 Seacoast Drive, Suite 108
Imperial Beach, CA 91932

15 May 2019

Jim Nakagawa, AICP City Planner
Community Development Department City of Imperial Beach
825 Imperial Beach Boulevard
Imperial Beach, CA 91932

Subject: MF 1234 RIB ND/LCP/GP and CAP (Comments on the Negative Declaration, ND)

Dear Mr. Nakagawa:

The Southwest Wetlands Interpretive Association (SWIA) is located in Imperial Beach and for over 30 years has championed and worked to protect the Tijuana River Estuary and wetland habitats in southern California. As a major proponent of effective coastal resource planning and addressing climate change, SWIA provides these comments and recommendations for the City of Imperial Beach's ND for the GP/LCP. The LCP/GP update is the CEQA "project," but as stated in the CAP, it is only a strategy document, not the CEQA (GHG) mitigation document for the project. SWIA appreciates the City's intent to produce and implement actions to mitigate and adapt to the inescapable impacts from climate change.

Our review of the documents and our comments provide recommendations, clarifications, improvements, and additions that we believe must be incorporated into the CAP and GP/LCP so that they are effective and comply with CEQA. Our separate, specific comments on the CAP and GP/LCP are attached and made a part of this comment letter on the Negative Declaration (ND). We believe that the City should incorporate the CAP (revised per our comment letter) as the CEQA mitigation for the project. That may require the City to recirculate the project CEQA as a Mitigated ND, or possibly as a Programmatic EIR – which has significant CEQA streamlining benefits to the City.

The introduction to the ND provides the California Environmental Quality Act (CEQA) context for the GP/LCP: "California Environmental Quality Act (CEQA) Guidelines Section 15265 indicates that CEQA shall not apply to activities and approvals necessary for the preparation and adoption of a local coastal program. However, because this project contains broader citywide General Plan policies, implementation activities, and a related Climate Action Plan, the entirety of these actions are being described and considered within this document."

LETTER A

- | | | |
|-----|-----|---|
| A-1 | A-1 | The comment is introductory in nature. The comment does not contain any substantive statement or questions about the Draft Initial Study/ Negative Declaration (IS/ND) or the analysis therein; no further response is needed. However, the City has made edits to the CAP to clarify the purpose of the CAP. The CAP is primarily intended to be a mechanism to reduce GHG emissions Citywide and is not a mitigation document. The CAP is a "project" pursuant to CEQA and is one component of the CEQA "project" analyzed within the Negative Declaration. Please see comment C-9. |
| A-2 | A-2 | The GP/LCP and CAP have complied with CEQA with preparation of the IS/ND in accordance with California Environmental Quality Act (CEQA) guidelines 15070- 15075. Please also see response to comments on Letter B and C. |
| A-3 | A-3 | As stated in the CAP Section 2.1 "The City of Imperial Beach CAP is intended to be a strategy for reducing emissions but is not currently intended to be used as a CEQA mitigation document. As in other communities throughout the state, the Imperial Beach CAP is a mechanism to support the State's climate protection efforts." The CAP is a standalone document and there have been no greenhouse gas (GHG) impacts identified with either the CAP or GP/LCP that require mitigation. Further, no other significant impacts have been identified associated with adoption and implementation of the CAP or the GP/LCP that would require mitigation. Please see comment C-9 for more information. |
| A-4 | A-4 | The comment reiterates an introductory statement made in the IS/ND. The comment does not contain any substantive statements or questions on the IS/ND; no further response is needed. |

Our comments on the GP/LCP identified potential impacts to beach and dune areas at Borderfield State Park, if the City implemented certain beach/shoreline protection measures. The City's SLR Assessment Report concluded that shoreline armoring was the least cost effective (in the long-term) approach to managing for projected effects from sea level rise. Also, beach armoring has the potential to exacerbate beach/shoreline impacts at adjacent and nearby areas that may not be suitable for or that would prohibit armoring. That concern could be addressed by including in the GP/LCP policy measures that would ensure that the City adopted the most cost-effective and least (long-term) potentially damaging beach/shoreline protective measures. As our LCP/GP letter made clear, we disagree with the City's proposed removal of managed retreat as one of the possible beach/shoreline protection/adaptation measures.

Additionally, our comments on the CAP recommended that the City include 2035 as a GHG target year and provide the analysis of what mitigation measures would be needed to ensure that the City's GHG reduction efforts aligned with regional efforts and state targets (post-2030). We identified a number of additional GHG reduction measures that would further reduce GHG emissions – particularly post-2030 - and that are included in most other CAPS in the region. Depending on that additional analysis, the City may need to recirculate the GP/LCP.

The relationship between general plans and climate change have changed substantially since the City's GP was prepared in 1994 (<https://oag.ca.gov/environment/ceca/planning>), though the City's current GP/LCP update may qualify for analysis through the ND process. While that approach to updating and approving the GP/LCP (and approving a separate CAP) via the ND may be sufficient, by not preparing a longer-range CAP (out to 2035 target year) and incorporating the CAP as an enforceable mitigation element, it misses an major planning and project-streamlining opportunity because the CEQA Guidelines were amended in 2009 to add a new provision, [Section 15183.5](#), which provides a framework for programmatic greenhouse gas emissions reduction plans. That plan would require:

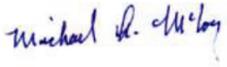
- Quantify existing and projected community-wide greenhouse gas emissions;
- Establish greenhouse gas emissions reduction targets over the life of the plan which, if achieved, would render the community's greenhouse gas emissions to be less than significant;
- Identify and analyze the greenhouse gas emissions resulting from sources in the community;
- Identify a set of specific, enforceable measures that, collectively, will achieve the emissions targets;
- Establish a mechanism to monitor the plan's progress and to require amendment if the plan is falling short; and
- Be adopted in a public process following environmental review.

We strongly recommend that the City revise its CAP to include (and analyze out to the 2035 target year) additional GHG mitigation measures. Also, the GP/LCP should provide additional policies – including retaining managed retreat to address shoreline mitigation/adaptation. Also, the policies should put substantive constraints on the use of measures (e.g., shoreline armoring) that can cause unintended impacts to beach/shoreline areas. The identified revisions and additions should be analyzed in a revised CEQA document; either as a Mitigated Negative Declaration or Programmatic EIR.

- A-5 Please see comment B-22 for beach armoring responses. Armoring strategies would need to comply with Coastal Act Chapter 3 and consider the 2018 Coastal Commission's Sea Level Rise Policy Guidance. Armoring devices have the potential to induce beach erosion near the device but we were not able to identify studies (https://pubs.usgs.gov/sir/2010/5254/pdf/sir20105254_chap8.pdf) that demonstrated impacts to more distant facilities, such as Border Field SP. No specific beach armoring is proposed within the GP/CP and no specific locations have been identified where beach armoring is proposed. This comment addresses the GP/LCP and does not address the adequacy of the IS/ND; no further response is needed.
- A-5 A-6 See comment B- 27 for managed retreat. While managed retreat was included as a potential strategy in the IB Sea Level Rise (SLR) Assessment, the City does not consider it a feasible adaptation strategy in the foreseeable future and does not intend to pursue it with this project. This position was strongly mirrored by community feedback received during the update process, through a series of meetings and discussions with community members. This comment does not address the adequacy of the IS/ND and requires no further response.
- A-6 A-7 Please see response C-3 and C-4. While the City acknowledges the importance of the regional efforts and state targets post 2030, there is no requirement to establish a 2035 target year since there is no adopted state 2035 target.
- A-7 A-8 As stated in A-3 the project did not find any significant GHG emissions and impacts. As stated in the CAP "The City of Imperial Beach CAP is intended to be a strategy for reducing emissions but is not currently intended to be used as a California Environmental Quality Act (CEQA) mitigation document. As in other communities throughout the state, the Imperial Beach CAP is a mechanism to support the State's climate protection efforts." The CAP has been established to support codified state GHG reduction targets and align with Executive Order S-3-05. Please see Letter C for more responses to the adequacy of the CAP.
- A-8 A-9 Please see CAP response C-9. This comment does not speak to the adequacy of the IS/ND; therefore, no further comment is needed.
- A-9 A-10 As stated in comment A-6, armoring strategies would need to comply with Coastal Act Chapter 3 and consider the 2018 California Coastal Commission Sea Level Rise Policy Guidance document. Additionally, as stated in B-27 community feedback regarding managed retreat indicated it did not appear to be a feasible option to include at this time.
- A-10 A-11 The IS/ND provides an adequate analysis for the project and complies with CEQA guidelines. No significant impacts have been identified requiring mitigation.
- A-11

SWIA has been and expects to continue to be a strong supporter of the City's natural resource conservation and future development efforts. Our contact on this issue is Bill Tippets (billtippets@gmail.com).

Sincerely,



Michael A. McCoy, President



Bill Tippets, Board Member

A-12

A-12 The comment includes contact information for the agency. The comment does not contain any substantive statements or questions about the IS/ND or the analysis therein, and no further response is necessary.

Attachments (CAP letter; GP/LCP letter)

LETTER B



Southwest Wetlands Interpretive Association
700 Seacoast Drive, Suite 108
Imperial Beach, CA 91932

15 May 2019

Jim Nakagawa, AICP City Planner
Community Development Department City of Imperial Beach
825 Imperial Beach Boulevard
Imperial Beach, CA 91932

Subject: MF 1234 RIB ND/LCP/GP and CAP (Comments on City of Imperial Beach General Plan/Local Coastal Plan - March 25, 2019)

Dear Mr. Nakagawa:

The Southwest Wetlands Interpretive Association (SWIA), which for over 30 years has fought for and championed the protection and restoration of the Tijuana River Estuary and wetland habitats in southern California, provides these comments and recommendations for the City of Imperial Beach's GP/LCP. SWIA, located in Imperial Beach, appreciates the City's intent to produce and implement actions to mitigate and adapt to the inescapable impacts from climate change.

The GP/LCP update provides improvements and clarifications to the City's general planning policies and coastal zone policies. Our review recommends clarifications, improvements, and additions that we believe must be incorporated into the CAP/LCP so that they are effective and comply with CEQA. As noted by the City, climate change and resiliency, environmental justice, housing, sustainability, community health, economic prosperity, multi-modal mobility, and sea level rise issues have become issues of concern at the state and regional government levels. A critical function of this GP/LCP update (which replaces a plan that was adopted by the City in 1994) is to provide near-term planning guidance but also to put the City on a pathway that anticipates and effectively directs City and private parties to implement appropriate actions that are consistent with projected long-term planning needs. To do that, the GP/LCP needs to better address:

1. How the City's will ensure that its Climate Action Plan (CAP) will be implemented and made the enforceable mechanism under the GP to reduce the City's greenhouse gas (GHG) emissions consistent with state targets (comments on the CAP are provided in a separate letter).

B-1 The comment is introductory in nature. This comment letter does not contain substantive statement or questions about the Draft Initial Study/ Negative Declaration (IS/ND) or the analysis therein; therefore, no further response is needed. However, the following responses have been provided as a courtesy.

B-1

B-2 The draft General Plan/ Local Coastal Plan (GP/LCP) Policy 4.1.1 calls for the City to adopt and implement a Climate Action Plan (CAP) that is aligned with state requirements, and Policy 4.1.2 calls for the CAP to be monitored and adjusted to ensure its effectiveness over time. General Plan policies regarding the CAP are "enforceable" through legal action similar to any other policy in General Plan. The City intends to adopt the GP/LCP update a few months after the CAP is adopted. In addition, the City has proposed a change to the CAP in Section 5.0 Implementation and Monitoring that includes a commitment to complete biennial inventory updates and monitoring reports beginning in 2020, as well as completion of at least one comprehensive CAP update before 2030.

B-2

2. The GP/LCP policies leave substantial uncertainties about how the City would institute changes to the land use and mobility elements (in particular) that effectively address long-term threats from climate change. How the City's GP/LCP will ensure that the City's Sea Level Rise (SLR) Assessment Report will be used to make environmentally and fiscally appropriate decisions for protecting and adapting private and City properties to SLR changes that do not exacerbate impacts to the adjacent Tijuana River Estuary and beach/dune system – or northward (Navy and state beach). Specifically, include managed retreat as an adaptation measure and establish conditions on the use of armoring.

B-3

B-3 The City has created a Sea Level Rise Checklist that includes monitoring and evaluation components to identify adaptation strategies that preserve and enhance the environment, economy, and community character of the City. The checklist evaluation incorporates best available science, which may be the 2016 Vulnerability Assessment, future updated assessments, or superior sources. Through the checklist information gathering and assessment process, the City has a framework to make informed decisions on adaptation strategies that are fiscally and environmentally appropriate for the point in time when action is needed.

Specific Comments

Page I-7 (Figure I-i). The SANDAG data projections indicate that from 2020-2050, the ratio of population:housing will increase (2.86 to 2.97 persons per housing unit) while the ratio of jobs:population will decrease (0.31 to 0.28 jobs per person). How are these demographic projections used to address land use (affecting housing locations and types) and mobility (will more residents, higher density and fewer City-based jobs/person increase demand for transit or roadways)?

B-4

B-4 The SANDAG "quick facts" data was included for information purposes only. It will be deleted from the draft document. Demographic information is included in the City's adopted Housing Element.

Page I-8. The list of GP Elements does not reference the role the City's Sea Level Rise (SLR) Assessment, which makes numerous findings related to – among other elements - Land Use, Mobility (Transportation and Public Transportation) and Hazardous Materials, could and does influence the GP/LCP. As noted in the GP/LCP, the City is "surrounded" on three sides by water and 87% is within the Coastal Zone. The GP/LCP land use element must clearly describe how the SLR Assessment findings are incorporated into this document.

B-5

B-5 Edits will be made to the General Plan Introduction to further highlight the importance of sea level rise. Details on the City's Sea Level Rise Assessment are found in the Safety Element.

Page L-5. The Coastal Policies do not – but should - identify sea level rise mitigation and adaptation as among the primary drivers for coastal policies. We recommend the text add: "Policy 2.1.1.7. Require all new or re-developed, protected, relocated, or removed land uses to address projected sea level rise and coastal flooding to maximize the sustainability of potentially affected developments and open space."

B-6

B-6 The draft General Plan/LCP Land Use Plan (GP/LUP) proposes multiple policies for future projects and programs to address sea level rise and sustainability, including but not limited to policies in the Safety Element Section 7.1 and the Design Element Section 8.3 Sustainable Coastal Development.

Page L-5. Table L-2 provides the specific development intensities for each implementing zoning code classification, but those zoning classifications are not identified on figures L-1 and L-2. A map should be included that shows the specific zoning classifications. That is important so that the locations of various zoning can be evaluated with regard to projected SLR and coastal flooding impacted areas.

B-7

B-7 The General Plan is a policy document. Zoning is a key mechanism for General Plan implementation. As such, zoning classifications are more appropriately located in the Municipal Code. The zoning map can be found in Title 19.06 of the City of Imperial Beach Municipal Code.

Pages L-9/10. The focus on increasing commercial and mixed-use development does not adequately describe how that will affect access and transportation. Because the City is also emphasizing its coastal town character and tourism, these future changes strongly suggest that transportation to/from as well as within the City should be a significant concern associated with future development. The text does not address the potentially needs for changes in local mobility/transportation. While it does mention locating new businesses close to transit, providing for parking and multimodal access, and promoting pedestrian use in some of the major commercial/mixed-use areas, there is little coherence regarding how these major business centers would be integrated within the community. Except for one reference

B-8

B-8 Based on the comments, edits are proposed to Section 2.4 Discussion text, and a cross-reference will be added to Policy 2.4.2. See also existing Section 2.2 Discussion text. The policy additions to the Land Use Element do not increase the density of existing permitted land uses. The updated Mobility Element supports the land use designations already in place.

in the 13th Street Corridor, these developments areas seem to be focused on attracting and accommodating outside use (tourism) more than the Imperial Beach community.

Page L-11/12. The description of coastal priority and visitor serving commercial uses does not include any reference to SLR and coastal flooding and focuses only on retaining if not increasing coastal access, developments, and uses. In light of the significant potential impacts from SLR/flooding on the City's coastal (and bay and estuary) properties, this part of the Land Use Element must provide much more policy guidance relative to projected SLR and flooding impacts. Relevant information in the City's SLR Assessment Report should be referenced and briefly described in this section.

Page L-13/16. The section on environmental justice and healthy communities does not address potential impacts from climate change and SLR/flooding on potential at-risk communities. Disadvantaged and low income individuals and groups have the least resources to adapt to climate change and/or protect or relocate out of areas that are projected to be most affected by SLR/flooding. The GP/LCP should discuss these issues and include policies to provide guidance for addressing them.

Page M-2. When is the city proposing to change from LOS (level of service) to VMT (vehicle miles travelled) as the metric for assessing traffic? VMT is now the standard by which most cities are assessing traffic and circulation – and GHG impacts related to mobility. The City should be using VMT in all of its assessments of traffic and circulation (and when addressing GHG emissions attributed to mobility).

Page M-3. We concur that the "mobility triangle" (Figure M-1) is an appropriate way to prioritize how the City should address its mobility needs, but how it will support the cited Coastal Act mobility guidance (Section 30252)? City residents are highly dependent on vehicles (94% of employed resident drive to work), transit/walk/bike use is a small fraction of total transportation mode share, and the City intends to promote its coastal tourism appeal: "To maintain and enhance Imperial Beach as "Classic Southern California"; a beach-oriented community with a safe, small town, family atmosphere, rich in natural and cultural resources." It is not clear how the GP/LCP mobility element provides, over the mid and long-term, a blueprint to address serious temporary-to-regular flooding (closures) of roads and even potential destruction of roads and bike routes (Table ES.2 in the SLR Assessment Report).

SANDAG recently announced its intention to dramatically revise the regional transportation system (<https://sandag.org/index.asp?newsid=1133&fuseaction=news.detail>) with the expectation that it will vastly improve transit services across the region. The City's mobility planning must incorporate sufficient flexibility to accommodate and take advantage of new opportunities to better connect and serve its residents through transit.

While providing specific implementation dates for enacting/implementing the mobility policies may not be feasible, each of the mobility sections should provide at least relative timeline for implementing all new or revised policies. Those should be added to and made part of the Performance Measures (Section 3.6).

B-9 Based on the comments, edits are proposed to the Background section of the Land Use Element to describe how the Land Use Element relates to other elements, including the Safety Element, which includes numerous policies related to flooding. All elements of the General Plan carry equal weight and are used together.

B-9

B-10 The discussion on Environmental Justice will be been expanded to reference the state's CalEnviro Screen tool. In addition, new policies will be added that environmental justice may be considered in the Coastal Development Permit process, and that the City will seek grant funding to qualified low-income applicants who would need to accommodate for future SLR. Existing draft policies provide guidance how to adapt to climate change and sea level rise, including those found in the Safety Element Section 7.1, and Design Element Section 8.3.

B-10

B-11 Policy 3.1.4 states: "In accordance with state law, develop a metric and thresholds of significance for Vehicle Miles Traveled (VMT), or adopt regional standards when available, to replace level of service as the primary determinant of transportation impacts." The timing for implementation is dependent upon development of regional standards and/or City budget allocations to develop the metric and go through the public outreach and hearing process for adoption.

B-11

B-12 Additional discussion text is being added to the Mobility Element Background section to provide examples of how draft policies support achieving the Sustainable Transportation Hierarchy and Complete Streets principles. Additionally, a policy is being added to Section 3.1 on how to improve resiliency when designing and implementing Capital Improvement Program projects, including mobility projects.

B-12

B-13 Additional discussion text is being added under "Regional Access" to acknowledge SANDAG's proposed new direction. The draft General Plan policies are designed to be flexible in order to adapt over time.

B-13

B-14 This set of comments calls for providing additional details and timelines for how certain policies will be implemented and monitored over time. This added level of detail will be considered as a follow-up item after GP/LCP adoption, in association with City budget discussions.

B-14

Page M-4, et seq. Section 3.1 describes the City's streets system and how the street hierarchy is intended to support each mode type. However, there is no discussion of targets for potential mode share changes or how the City would promote a transition emphasizing transit and active transportation over vehicle use (per Figure M-1). The document should provide more description about what (relative, it not quantified) level of mode shifts are expected.

B-14
Cont

Page M-14, et seq. Section 3.2 describes the City's approach to transit. It relies mostly on the regional transportation planning by SANDAG and regional services by MTS. It does not discuss or describe how transit policies would affect future mode share or mode shifts to transit. While it does raise the possibilities for adding a transit transfer station and a mobility hub, it does not present any further discussion of how or what those could be expected to produce in terms of transit use. The section does not include any discussion of how or what additional criteria should be part of a transit strategy, such as minimum distance from transit stops for neighborhoods and the potential for establishing "mini-route" public services within the City to connect more residents to the transit system, City services, and commercial/recreational centers in general.

B-15

B-15 The City will consider these suggestions when collaborating with SANDAG during the RTP process. Additionally, the 95 MTS routes, the 933 and the 934 already are among the most utilized routes in the system. Additionally, the new 925 Rapid bus routes will facilitate connections to the University of California, San Diego Blue Line.

Page M-17, et seq. Section 3.3 outlines a reasonable framework for bike routes and types of bikeways. The map (Figure M-5) does not, but should, include a connection between the Ecoroute and CA Coastal Trail. Also, the policies should address and discuss how bike and scooter use will be treated; or at least specify that a scooter policy will be developed and implemented (and provide a timeline).

B-16

B-16 The City will consider this comment as it continues to collaborate with SANDAG at the staff and elected official levels. Transit route development and metrics would be suitable for a subsequent work program. Regarding the requested bike path connection, the City will continue to collaborate with the Navy to address the connection as a part of a future GP/LCP update. Policy 3.1.25 addresses micro mobility. A minor edit is proposed to cite scooters as a micro mobility example.

Page M-20, et seq. Section 3.5 does not address the high/hidden costs of free parking (https://en.wikipedia.org/wiki/The_High_Cost_of_Free_Parking). The issue of reducing parking is contentious (<https://patch.com/california/san-francisco/minimum-parking-requirements-removed-supervisors>), but efforts are occurring across the state to reduce or remove parking requirements. As suggested in our previous comments about transit, the City should include policies that promote a stronger set of public transit services that would allow reasonable reductions in parking capacity. Those services would be consistent with coastal requirements for access, but would also free-up space for more coastal-dependent uses/services and reduce costs.

B-17

B-17 An edit is proposed to the Mobility Element Section 3.5 to discuss the true cost of parking. Policy 3.5.1 is based on Donald Shoup's *High Cost of Free Parking* recommendations.

Page M-22. Section 3.6 (Performance Measures) does not include guidance or requirements for timelines to implement the policies and any actions that result from implementing the policies. Merely reporting on the status of actions, absent relevant timelines, is insufficient. If those timelines are presented in other documents associated with the LCP/GP update, then provide the specific source(s) where they are found.

B-18

B-18 See response to B-14, above.

Page C-3. This document states the City's General Plan provides the policy framework for its Climate Action Plan (CAP), which is to be the City's plan for reducing its GHGs. But, as the City states in its CAP, "The City of Imperial Beach CAP is intended to be a strategy for reducing emissions but is not currently intended to be used as a California Environmental Quality Act (CEQA) mitigation document....to support the State's climate protection efforts...(and) has been developed in parallel with a targeted update of the City's General Plan and LCP." That statement that the CAP is not the City's formal (binding mitigation) requirement to reduce GHGs, and raises the question whether the City has a formal, binding

B-19

commitment to reduce GHGs. Our letter on the CAP recommended that the CAP include a GHG 2035 target year and additional GHG emission reduction measures (if needed), consistent with the GHG analysis in the SANDAG RTP/SCS. That approach would be consistent with how most other jurisdictions are addressing GHGs reductions in their CAPs. Policy 4.1.1 (Adopt and implement a Climate Action Plan that is aligned with state requirements for greenhouse gas emission reductions, while achieving local co-benefits) may not require the City to incorporate the CAP into the GP/LCP as a mitigation requirement pursuant to CEQA. That approach is based on the City's ability to achieve the 2030 GHG reduction target that does not cause additional impacts and mitigation. However, as we recommended in our letter on the CAP, the City should at least include a 2035 target year, determine if additional mitigation measures are required, and include the CAP in the CEQA review (which may require recirculation of a Mitigated Negative Declaration or preparation of an EIR).

B-19
Cont.

B-19 See responses to Letter C.

Page C-5. Section 4.2 describes the City's urban forestry approach. It needs to include a commitment to produce a formal Urban Forestry Plan that establishes goals and commitments for the urban tree canopy (where should the tree canopy be prioritized, how many trees should be planted and what timeline, how will the tree canopy be managed, etc.). Also, the discussion of complete streets should include trees as part of the complete streets policies and requirements.

B-20

B-20 Regarding preparing an Urban Forestry Plan, see response to B-14, above. Regarding trees as a part of a complete streets policy, an edit is proposed to the Mobility Element Section and Policy 3.1.22. Please note that there is an entire section of the General Plan dedicated to Urban Forestry (Conservation Element Section 4.2) and a subsection of the Urban Design Element focuses on the City's "Tree-Covered City Image" (Design Element Section 8.2). All elements of the General Plan carry equal weight and are used together.

Page C-5, et seq. Section 4.3 (Biological Resources) provides a brief overview of biological resources within and adjacent to the City. The focus is on the Tijuana River and Estuary ecosystem, but the City also has coastal beach resources that are not discussed. The document should acknowledge that SWIA is a major funder of projects in the Tijuana River/Estuary (TRNERR and Borderfield SP manage parts of the system).

Because climate change, particularly sea level rise and coastal flooding, will be dominant threats to the City's biological resources, the Policies should include more discussion about how those threats will be addressed in the General Plan. The City's SLR Assessment Report ([https://www.imperialbeachca.gov/vertical/sites/%7B6283CA4C-E2BD-4DFA-A7F7-8D4ECD543E0F%7D/uploads/100516_IB_Sea_Level_Rise_Assessment_FINAL\(1\).pdf](https://www.imperialbeachca.gov/vertical/sites/%7B6283CA4C-E2BD-4DFA-A7F7-8D4ECD543E0F%7D/uploads/100516_IB_Sea_Level_Rise_Assessment_FINAL(1).pdf)) provides a discussion and a list of potential adaptation measures that presumably would be incorporated into the General Plan. And because those actions could impact (negatively and positively) the City's biological resources, the biological resource policies must include a reference to or summarize the relationships between the GP and SLR report in terms of addressing (protecting and managing) biological resources. Studies of beach structures, including armoring have found both positive and negative effects (https://pubs.usgs.gov/sir/2010/5254/pdf/sir20105254_chap7.pdf; <https://onlinelibrary.wiley.com/doi/full/10.1111/conl.12323>), but the potential for causing negative effects on adjacent beaches is a real and serious concern for the Borderfield State Park beaches just south of the City's developed beach shoreline – or northward along the federal (Navy) and state beach/dunes.

B-21

B-21 The City agrees with this comment and proposes edits to Section 4.3 of the GP/LCP to briefly summarize the 2016 SLR Assessment report findings related to biology, and how the proposed SLR checklist (part of the LCP/IP) supports using best available science and monitoring to assess impacts over time.

B-22 The City has sponsored sand replenishment projects and has issued permits for revetments and seawalls along Seacoast Drive. However, the City lacks jurisdiction to permit shoreline protective devices south of Seacoast Drive. Armoring strategies would need to comply with Coastal Act Chapter 3 and consider the 2018 Coastal Commission's Sea Level Rise Policy Guidance document. Armoring devices have the potential to induce beach erosion near the device but we were not able to identify studies (https://pubs.usgs.gov/sir/2010/5254/pdf/sir20105254_chap8.pdf) that demonstrated impacts to more distant facilities, such as Border Field State Park. Softer solutions such as sand replenishment appear to show that sand may migrate such that it would close the river mouth. This is one of the impacts that the City will need to assess if it should implement a sand project in the future. The living shoreline/sand dunes project in Encinitas will be closely watched to see if the sand would close off San Elijo Lagoon. The City is proposing using the SLR checklist to determine the most appropriate beach/shoreline protective measure under varying circumstances over time. No specific measures are proposed at any location at this time.

B-22

The City's SLR Assessment Report (summarized in Table ES.2) states that in the long term, combinations of groins, managed retreat and sand/cobble replenishment would be most effective and least costly to the City and residents. However, city residents oppose managed retreat

<https://www.sandiegoreader.com/news/2018/nov/16/stringers-ib-tries-calm-fears-eminent-domain/#>). Armoring can lead to accelerated beach sand losses at adjacent/nearby beach shorelines, though it may be necessary to address emergencies and may be appropriate as short-term protective solutions. Recent court findings have supported the CA Coastal Commission decision to limit a coastal permit for a sea wall to 20 years: <https://www.businessjustice.com/the-california-court-of-appeal-allows-california-coastal-commiss.html>. We are concerned that the language in the GP/LCP will be used to facilitate extensive and long-term armoring of private and City properties, which increases the potential to exacerbate shoreline erosion along the Borderfield State Park beach and dune system, and possibly along the northern peninsula (federal and state beach properties). The beach and dune system is essential to protect the western estuary/channels from being filled-in by storm waves (as happened during the 1982-1983 El Nino storms), and the current language in the GP/LCP poses a potential for greater impacts to the Tijuana River Estuary and beach/dune system. Shoreline protection projects that exacerbate the loss of beach/dune shoreline would be a potentially significant impact anywhere along the Coronado strand to Tijuana River Estuary.

B-22
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That concern could be addressed by including in the GP/LCP policy measures that would ensure that the City adopted the most cost-effective and least (long-term) potentially damaging beach/shoreline protective measures.

Where are environmentally-sensitive habitat areas (ESHAs) described and identified within the City's boundaries? The GP should provide a description and map of the ESHAs (or cite and provide another source where that information is presented).

B-23

Page C-13. Section 4.5 (Air Quality) does not provide a sufficient discussion about how GP policies addressing mobility will affect/influence air quality.

B-24

Page P-1, et seq. (Section 5 – Parks, Recreation and Coastal Access Element). As described above, we have serious concerns about the potential impacts about how the City intends to protect/maintain its beaches and implications for how any shoreline/beach protection measures would affect adjacent Borderfield SP shoreline recreational access and use.

B-25

Page F-1 et seq. (Section 6 – Facilities and Services Element). In addition to Policy 6.1.5 (prepare an urban tree canopy/urban forest plan), the City should provide more clarity and certainty about when that plan will be prepared (the CAP states the City will plant 866 trees by 2030 – how was that number determined). That plan should utilize the regional urban tree canopy dataset (<http://hci-sandiego.sandag.org/indicator/18074>) to develop specific tree planting locations and numbers.

B-26

The document should require the preparation of a drought contingency plan, if not already part of the CalAm Urban Water Management Plan (UMWP). The drought plan should be integrated with and made a part of the City's CAP adaptation strategies (which are missing in the CAP).

B-27

Page S-1 et seq. (Section 7 – Safety Element). The document states that the time horizon of the GP/LCP is shorter than the time period at which the most severe sea level rise threats would require substantial adaptation responses by the City. It then states (regarding mitigation/adaptation to sea level rise): "It is

B-28

B-23 The Coastal Act definition of ESHA is provided in the "Background" section of the Conservation and Ecotourism Element. Under the GP/LCP, the City is not proposing to map ESHA. The City's wetlands resources are already protected from development and preserved as open space. TRNERR, with its designation as a Preserve, is under the management of the wildlife agencies, and has a currently established buffer requirement. The current protected status of TRNERR is further emphasized by its designation by the International Ramsar Convention, 2005, as a "Wetland of International Importance."

In response to comments, new discussion text is proposed to describe potential ESHA and a new policy is proposed to "Require that new development in or adjacent to areas that could qualify as potential ESHA conduct site-specific biological studies and determine appropriate buffers, in consultation with the Coastal Commission as a part of the discretionary review process."

B-24 An edit is proposed to the GP/LCP Conservation and Ecotourism Element Air Quality "Discussion" section 4.5 as follows: "Mobility Element Complete Streets principles and policies are designed to reduce vehicle miles traveled which in turn results in reduced air pollutant emissions."

B-25 See B-22 response.

B-26 Edits to the CAP are proposed to consider an Urban Forest Management Plan as a follow-up item after GP/LCP adoption, in association with City budget discussions. To formalize this intent, identification and pursuit of a funding source has been added as a supporting effort to Measure S.1: Tree Planting. Background on the determination of that number is included in CAP Appendix B Section 6.5.1.

B-27 The drought contingency plan is included in the CalAm Urban Water Management Plan. An edit is proposed to reference CalAm's drought contingency plan. Water conservation and adaptive management policies are addressed in the Facilities and Services Element. See Policy 6.8.4.

B-28 Policy edits are proposed to the GP/LCP to clarify the City's approach to sea level rise adaptation. While managed retreat was included as a potential strategy in the IB SLR Assessment, the City does not consider it a feasible or necessary adaptation strategy in the foreseeable future for this GP/LCP and does not intend to pursue it. This position was strongly mirrored by community feedback received during the update process, through a series of meetings and discussions with community members.

important to note that the identification of vulnerabilities described in the IB SLR Assessment assumed that no additional adaptation strategies would be employed other than those in place in 2016. These potential impacts could be mitigated in part or in whole with additional adaptation efforts.” The GP/LCP does not identify what those “additional adaptation efforts” will be or that it has a plan for implementing them, thus the vulnerabilities and impacts identified in the SLR Assessment report are what the GP/LCP should plan for.

As detailed in the Appendix to the Negative Declaration, proposed language in the Safety Element (Coastal Policy 16) states: “New discussion text on sea level rise assessment and adaptation strategies under consideration. Managed retreat is not included in the draft General Plan and is not being pursued.” By denying to include managed retreat in the LCP/GP update, the City is refusing to acknowledge the findings of its own SLR Assessment that concluded that coastal armoring is not the most cost-effective mitigations/adaptation measure in the medium/longer time horizon. And, as our cited information above documents, armoring may also exacerbate coastal erosion on adjacent or nearby shoreline areas.

Our comments on the CAP summarized information from the world’s leading source of climate change information and projections of climate effects, the IPCC, which has recently reported that GHGs are not being reduced at the rate needed to stabilize the climate. The uncertainties of forecasting climate change effects, and the potential that effects will be greater and occur sooner than projected, argues for the City’s GP/LCP to be more progressive in identifying what and those “additional adaptation measures” related to sea level rise are and when they would be implemented (and the CAP should have an adaptation section, as noted in our comments on the CAP). The City’s SLR Assessment concluded that in the medium/longer-term, managed retreat and groins would likely be more cost-effective than armoring and sand replenishment – particularly when armoring aggravates beach sand loss in the longer term. The City should reconsider whether choosing not to implement the most cost-effective SLR measures earlier rather than later is really the best decision for its residents and businesses. Because of the potential for armoring to exacerbate beach sand loss, we have concerns about the potential impacts of armoring City beaches on Borderfield State Park’s beach and sand dunes. All beach/coastline protection and stabilization actions must be coordinated with the Borderfield SP and TRNERR managers so that unintended impacts do not occur to the state beach, dunes, and estuary.

We disagree with the City’s proposed exclusion of managed retreat as an approved shoreline protection/adaptation measure. By doing so, the City’s decision could lead to an increase in coastal erosion and additional impacts to “protect” coastal resources.

Page S-10. Policy 7.1.1 states that the SLR Assessment will be updated approximately every 10 years. Given the current global failures to reduce GHGs at a rate necessary to limit impacts to “acceptable” levels of GHGs (e.g., global atmospheric CO₂ continues to rise above 400 ppm) that could cause average global temperatures to approach and exceed 1.5-2°C above pre-industrial average, the City should plan to update the SLR Assessment if/when major findings of worsening GHG forecasts and climate effects are published. “Major changes” is a relative term, but could include evidence that GHG emissions are not being reduced such that global temperature increase will exceed the “acceptable” level of 1.5-2°C.

B-28
Cont.

B-29

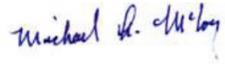
B-29 The City plans to utilize the best available science to track sea level rise trends. This will ensure that as the science evolves the City will have the flexibility to utilize new findings and research as it becomes available. See Policy 7.1.3.b in the GP/LCP. Also, the City has entered into a partnership with the Scripps Institute of Oceanography to monitor local sea level rise trends as an additional data input beyond updated vulnerability assessments.

As noted previously, City efforts to stabilize and protect its beaches (Policy 7.1.6-7.1.11) must not create or exacerbate beach/shoreline erosion in the adjacent Borderfield SP beach/dune/estuary mouth. All City-proposed shoreline protection structures and activities must be coordinated with the Borderfield SP and TRNERR managers.

B-30 B-30 See B-22 response.

We appreciate the City's efforts to update and improve the General Plan and Local Coastal Plan. Our contact on this issue is Bill Tippetts (billtippetts@gmail.com).

Sincerely,



Michael A. McCoy, President



Bill Tippetts, Board Member

LETTER C



Southwest Wetlands Interpretive Association
700 Seacoast Drive, Suite 108
Imperial Beach, CA 91932

15 May 2019

Jim Nakagawa, AICP City Planner
Community Development Department City of Imperial Beach
825 Imperial Beach Boulevard
Imperial Beach, CA 91932

Subject: MF 1234 RIB ND/LCP/GP and CAP (Comments on the Climate Action Plan)

Dear Mr. Nakagawa:

The Southwest Wetlands Interpretive Association (SWIA), which for over 30 years has championed and implemented projects to protect the Tijuana River Estuary and wetland habitats in southern California, provides these comments and recommendations for the City of Imperial Beach’s CAP, LCP and ND. SWIA, located in Imperial Beach, appreciates the City’s intent to produce and implement actions to mitigate and adapt to the inescapable impacts from climate change. As a major proponent for, and funder of, (wetland) resource management and restoration efforts that will help reduce climate changing factors, we strongly support the City’s intention to reduce greenhouse gas (GHG) emissions.

Our review of the documents recommends clarifications, improvements, and additions that we believe must be incorporated into the CAP and aligned with LCP so that they are effective and comply with CEQA. The most significant of our issues include:

1. Incorporate the CAP as an integral part of the General Plan and make its measures requirements, so that it serves as the enforceable GHG mitigation mechanism pursuant to CEQA.
2. Include more GHG emission reduction measures and add target year 2035 to the analysis.
3. Advance the implementation timeline and intensity of certain measures.
4. Include adaptation policies and measures (to complement those identified in the Sea Level Rise Assessment Report).

1.0 Executive Summary. The Executive Summary describes a CAP that, in parallel with the amended GP/LCP, seeks to put the City on a trajectory for achieving regional and state GHG emission reduction

C-1	C-1	The comment is introductory in nature. The comment does include the major points of the letter; however, those are elaborated on further in the body of the letter and addressed in the specific responses below. These comments do not contain any substantive statement or questions about the Draft Initial Study/ Negative Declaration (IS/ND) or the analysis therein; therefore, no further response is needed related to the environmental document.
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targets/goals as well as preserve and enhance the economy, environment, and community character of Imperial Beach.

The City has produced a sea level assessment (<https://www.imperialbeachca.gov/sealevelrise>; [https://www.imperialbeachca.gov/vertical/sites/%7B6283CA4C-E2BD-4DFA-A7F7-8D4ECD543E0F%7D/uploads/100516_IB_Sea_Level_Rise_Assessment_FINAL\(1\).pdf](https://www.imperialbeachca.gov/vertical/sites/%7B6283CA4C-E2BD-4DFA-A7F7-8D4ECD543E0F%7D/uploads/100516_IB_Sea_Level_Rise_Assessment_FINAL(1).pdf)), and the relationships and coordination/integration of that document with the CAP/LCP (and General Plan) must be more clearly explained. A complete CAP involves both mitigation and adaptation components and the CAP lacks the adaptation component. This makes it particularly important for the City to explain and assure that all of these plans and their implementation will provide for consistent, coherent and integrated actions. And that the City will provide the funding to implement and monitor/report on the results of implementation and adaptive management.

Also, we recommend that the CAP provide more context to the seriousness of GHG emissions and the need for greater reductions after 2030. In particular, the CAP should include a summary of a recent (2018) IPCC report (https://report.ipcc.ch/sr15/pdf/sr15_spm_final.pdf; <https://www.theguardian.com/environment/2018/oct/08/global-warming-must-not-exceed-15c-warns-landmark-un-report>; <https://www.nationalgeographic.com/environment/2018/10/ipcc-report-climate-change-impacts-forests-emissions/>), which demonstrates the inadequacy of current climate actions, the immediacy of the need to reduce GHGs as rapidly as possible, and the necessity to accelerate removal of carbon from the atmosphere. Additionally, the CAP must address if/how it is consistent with Executive Order B-55-18 that directs the state to achieve carbon neutrality no later than 2045 and maintain net negative emissions thereafter: <https://www.gov.ca.gov/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf>.

Baseline Emissions and Reduction Strategies. The CAP appears to use standardized methods to calculate the City's baseline GHG emissions and BAU/ABAU projections and adopts reduction targets (Years 2020 and 2030) and goals (Year 2050) that align with state targets and goals. However, because the San Diego Regional Transportation Plan (RTP) – which includes the City of Imperial Beach - uses 2035 as a target date, the CAP should also include 2035 emission projections and an analysis of reduction measures on those emissions. As shown in Figure 3.5 of the CAP, current federal and state requirements provide the bulk of GHG reductions out to 2030; after then, the relative contribution from those sources decreases and that will require greater local (City) reduction measures.

Also, as noted above, the state recently adopted EO B-55-18, which would require more aggressive reduction measures than those used in this CAP. To address this issue, we recommend that the CAP provide additional measures, analyze the CAPs performance at least out to 2035, and where feasible advance the timelines for implementing its reduction measures. Specific recommendations are provided in this letter.

All jurisdictions have unique circumstances that suggest or require special measures to be part of their climate action plans. As is the case for all jurisdictions in the San Diego Region, Imperial Beach's emissions are dominated by the transportation sector. The CAP indicates that at least through 2030

- C-2 The Climate Action Plan (CAP) is part of a larger effort by the City to update its Local Coastal Program (LCP) and General Plan (GP). In 2016 the City completed a Sea Level Rise Vulnerability Assessment. The City has built off this work and has incorporated consideration of sea level rise into the LCP/GP. Additionally, the GP/LCP contains a number of additional policies that have adaptation and resilience components that address climate stressor impacts such as wildfires and air quality. However, based on the comment, additional discussion language on adaptation will be added as well as a new proposed policy on extreme heat related to the urban heat island effect. The City recognizes the importance of other climate change impacts and will seek resources to address these broader impacts as part of a future update. While the City acknowledges the importance of addressing these impacts there is no requirement to do so in the CAP.
- C-2
- C-3 The CAP acknowledges that the state of California has established reducing GHG emissions as a policy priority. No further acknowledgement is needed since the CAP is intended to support codified state GHG reduction targets. Relatedly, as an Executive Order B-55-18 is a goal and not a requirement. The City recognizes that this is likely to change and become a requirement in future years. The CAP is in alignment with SB 32's target to reduce emissions to 40% below 1990 levels by 2030, is in alignment with Executive Order S-3-05's goal to reduce emissions 80% below 1990 levels by 2050. In a future CAP update the City may choose to align with Executive Order B-55-18. Furthermore, the City intends to update the CAP as the state codifies one or more interim targets beyond 2030 and achieve its fair-share of reductions to support those targets.
- C-3
- C-4 The CAP has been established to support codified state GHG reduction targets and align with Executive Order S-3-05. While the City acknowledges the importance of the SANDAG RTP there is no requirement to establish a 2035 target year since there is no adopted state 2035 target. The comment also states that the relative contribution from federal and state requirements is projected to decline after 2030. This is correct; however, the State's current Scoping Plan does not extend beyond 2030 and as a result does not include any additional state reduction measures beyond what is already in place or being elaborated in alignment with the Scoping Plan. Additionally, the state has not adopted codified targets beyond 2030. As the state establishes interim targets beyond 2030 and updates its Scoping Plan, new state reduction efforts will be established. As part of the next CAP update the City will identify the need for new measures and/or adjustments to existing measures to support additional state targets.
- C-4
- C-5 See C-4 response. Additionally, the CAP accounts for the impacts of existing adopted state and federal actions and does not speculate on potential rollbacks of such actions. Should existing adopted actions be changed the City will adjust the CAP as part of its implementation, monitoring, and CAP update process in order to achieve its fair-share of reductions.
- C-5

federal and state actions would comprise 75% of all reductions and the remaining 25% from local actions. However, the status of federal (and California) vehicle-related GHG reduction measures are in flux because of federal proposals to reduce federal standards and California’s waiver (<https://www.npr.org/sections/thetwo-way/2018/04/02/598888447/epa-moves-to-weaken-landmark-fuel-efficiency-rules>; <https://www.theatlantic.com/science/archive/2017/03/trump-california-clean-air-act-waiver-climate-change/518649/>). We are concerned that those efforts (if implemented) and the CAP’s limited set of measures to achieve the local share of GHG reductions are inadequate. Other local jurisdictions’ CAPS, such as the City of San Diego and County of San Diego include a more robust set of reduction measures (e.g., <https://www.sandiego.gov/blog/climate-action-plan>; https://www.sandiegocounty.gov/content/dam/sdc/pds/advance/cap/publicreviewdocuments/PostBOS_Docs/San%20Diego%20County%20Final%20CAP.pdf). The CAP is designed only to achieve the minimum needed to “close the gap” remaining after federal-state actions, which is short-sighted in light of the obvious need for substantial local actions post-2030 (which are not, but should be, analyzed in the CAP). The CAP should include a more robust set of local GHG reduction measures because as noted previously, the relative reductions from federal-state actions will diminish over time. If the CAP does not identify additional local measures – even if those would only need to be phased-in after 2030 – that could set the City on a trajectory to fail to meet its post-2030 GHG reduction goal (80% below the 1990 baseline by 2050 per S-03-05) or the GHG reductions that would be necessary to meet net zero emissions per EO B-55-18, both of which are likely to be codified by the state (as was the 40% reduction from the baseline by 2030 per SB 32).

The addition of a 2035 target with appropriate GHG emission reduction measures, and analysis of the revised CAP is justified based on the compelling, substantial evidence that GHG emissions and climate effects are most likely to worsen compared to what has been projected in previous forecasts. The Imperial Beach CAP, like most other jurisdictions’ CAPS, should provide a clear pathway to achieve GHG emission reductions out to at least 2035. It should also provide a brief discussion of post-2035 GHG emissions and additional reduction needs to reach the S-03-05 or B-55-18 targets.

2.0 Planning for Climate Change. The CAP provides a general introduction to and explanations for why its CAP differs from most: low industrial/commercial businesses, high percentage of commuters (95% of workforce commutes out of the City), focus on its beachtown/tourism, etc. It describes the opportunities (in terms of authority and funding) for transportation-related GHG reduction measures as limited (page 6) and provides no specific energy efficiency measures (page 6). We disagree with the City’s positions on those issues and later in this letter provide information to support additional or more intensive measures.

The CAP states (page 7) that diversion of solid waste is the primary source of City-based GHG reductions; Table 1.2 indicates it will comprise 51% of its local reductions by 2030. Given the reliance on waste diversion as a mitigation measure – and consistent with our recommendation to add a 2035 target year to the analysis and the City’s stated intention to achieve its Zero Waste by 2050 Policy – the CAP should include a higher diversion rate (and analyze the GHG emission reductions) for 2035. And, though carbon sequestration (capture) by tree planting is identified, and the potential for greater sequestration in shoreline and wetlands is mentioned, the latter is not evaluated nor a measure identified to do so. We

C-5

C-6

C-7

C-8

C-6 This comment is introductory to comments pertaining to Chapter 2.0 of the CAP. Those comments are elaborated on further in the body of the letter and addressed in the specific responses below.

C-7 There is no requirement to establish a 2035 target year. See C-4 response. The next CAP update will include post-2030 targets, as established by the state, and include measures to meet those targets.

C-8 CAP measure S.1: Tree Planting includes a supporting effort to identify additional carbon sequestration opportunities that includes identifying specific projects and methodologies to quantify reductions. The supporting effort has been amended to acknowledge the importance of working with other agencies to identify and execute these opportunities, including quantifying GHG reductions and qualitatively assessing potential adaptation co-benefits.

strongly urge the City to include more carbon sequestration efforts into its CAP - and at a minimum, include a commitment to work with TNERR and other entities to develop specific wetlands carbon sequestration measures within 5 years.

C-8
Cont.

The Purpose of Imperial Beach's Climate Action Plan. The CAP states: "The City of Imperial Beach CAP is intended to be a strategy for reducing emissions but is not currently intended to be used as a California Environmental Quality Act (CEQA) mitigation document....to support the State's climate protection efforts...(and) has been developed in parallel with a targeted update of the City's General Plan and LCP."

This raises the central question whether the City intends for the CAP to be a funded, implemented, and enforceable document. A CAP that is developed in "parallel" with the General Plan and LCP must also be funded, implemented and enforced by the City or it will provide no assurances that it will achieve the stated GHG emission reduction targets and goals. We strongly recommend and urge the City to make the CAP an essential part of the General Plan/LCP and the mechanism by which the City General Plan complies with state GHG laws and orders, and ensures full mitigation of GHG emissions. As stated previously, the CAP and SLR Assessment Report must be complementary and integrated with the LCP and General Plan.

C-9

C-9 The City has made edits to clarify the purpose of the CAP with edits to the CAP. The CAP is primarily intended to be a mechanism to reduce GHG emissions. The CAP is not currently set up to mitigate the GP/LCP, and no significant GHG impacts have been identified.

Regional Efforts. The document cites regional vehicle-related GHG emission reductions targets in the 2015 Regional Transportation Plan (RTP), but the CA Air Resources Board adopted different percentages for the San Diego Region, effective October 2018: <https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets>. Projections of vehicle miles travelled (VMT) of regional VMT indicate a continuing, if slowing, rise in VMT (http://www.scforward.com/pdfs/EIR_final/Section%204.15%20Transportation.pdf; see page 4.15-22 for projected VMT). Appendix A (Table 14) and Appendix B (Table 4) project that Imperial Beach VMT will increase as well over the target years.

C-10 The CAP has been updated with the different percentages adopted by the California Air Resources Board noted in the comment. The comment also suggests that "the City should commit to identify and support more transportation-related GHG reduction measures in the RTP that will increase its transportation-related contribution to reducing GHGs." Measure T.3 in the CAP: Increase Mass Transit Ridership has been amended to include a supporting effort to identify additional RTP measures. Policy 3.2.1 of the General Plan Mobility Element update also states that the City will work with regional agencies to improve public transit services.

C-10

The CAP states (page 10): "There are no local government requirements resulting from SB 375." But the regional reductions depend on local governments to work cooperatively through SANDAG to meet the targets. Given that 95% of the Imperial Beach workforce commutes to jobs outside of the City, 75% of employed residents drive alone to work, and only 4% use transit (page 6), the City should commit to identify and support more transportation-related GHG reduction measures in the RTP that will increase its transportation-related contribution to reducing GHGs.

3.0 Greenhouse Gas Emissions. The CAP states that cities with little industrial, commercial and agricultural businesses, such as Imperial Beach, have "...generally low per capita emissions." However, vehicle-based emissions are very substantial contributors to GHG emissions, and the CAP has documented the City also has a high percentage (56.4%) of those emissions compared to many other jurisdictions. The CAP must provide the data and include calculations of the City's per capita GHG emissions. Also, jurisdictions have used per capita (and/or per service population) emissions as a metric to demonstrate projected CAP performance and to evaluate implementation effectiveness; the City should provide that metric and how it will be used in the CAP (in addition to mass emissions).

C-11

C-11 There are multiple approaches for cities to identify reduction targets in CAPs. The City has elected to utilize a mass emissions target as opposed to a per-capita target. As noted in the comment, cities with similar profiles as Imperial Beach generally have low per-capita emissions. The City evaluated using per-capita emissions as an approach but elected to utilize mass emissions because per-capita emissions are relatively low, and a mass emissions target was deemed to be more meaningful. As such, it has not been included as a metric in the CAP.

Imperial Beach GHG Inventory and BAU Projections. The CAP appears to use standard methods to calculate GHG emissions and develop the BAU/ABAU projections. As we have stated previously, the BAU/ABAU projections must include the Year 2035, which is a target year for the RTP. Including Year 2035 in the CAP is also important to establish an intermediate point between the State’s GHG 2030 target year and 2050 goal year.

C-12

C-12 See C-4 response.

The CAP states (page 15) that it “...should only be viewed as a foundation for reducing overall community-wide emissions. Separate and complementary actions by residents and businesses in addition to CAP strategies and measures would result in additional reductions.” This statement is perplexing because there is no context to understand how residents and businesses are expected to develop and implement these unspecified strategies and measures. What are they and why isn’t the CAP including those strategies and measures in Chapter 4 (Emission Reduction Measures)?

C-13

C-13 The City’s CAP provides a pathway for the City to reduce GHG emissions that are under its influence. This statement in the CAP is intended to convey that residents and businesses can, of their own accord, take individual actions that will further reduce emissions. Actions such as biking, walking, taking transit, accessing rebates and incentives offered by other agencies, reducing waste, and many others would result in emissions reductions above and beyond those resulting from the specific measures in the CAP. The CAP, and the manner in which it is implemented, plays a role in supporting the ability of residents to make these choices. For example, the City’s efforts to expand and improve the active transportation network will make it more feasible for residents to reduce single-occupancy vehicle use, as will City efforts to inform residents and businesses about energy efficiency incentives available from other entities such as SDG&E. The statement is an acknowledgement that residents and businesses play an important role in reducing GHG emissions as well through their own behaviors and actions. The statement has been further elaborated on to clarify this.

BAU Projections, Targets, and Local Gap. The tables and figures in this section present a reasonable approach and methods (and targets) that serve as the basis for developing the emission reduction measures. However, because of the substantial contribution that federal and state GHG emission reduction measures have out through 2030, it appears City has chosen not to identify and promote local GHG reductions beyond what is minimally needed to close the gap. In contrast to other CAPs in the San Diego Region, the City’s CAP identifies far fewer local GHG reduction strategies and measures.

C-14

C-14 See C-4 response above. Additionally, the City will monitor and implement the CAP to ensure that it is on track to meet the 2030 target and has committed to do at least one update before 2030. Updates to the CAP will include new measures and adjustments to existing measures as necessary to meet this goal and align with additional state targets as they are codified.

Tables 3.3 and 3.4 include footnotes that refer to per capita emissions and targets. However, the document does not provide sufficient descriptions of how per capita emissions will be used (see our initial comment under “Greenhouse Gas Emissions”).

C-15

C-15 See C-11 response. The footnote has been removed.

4.0 Emission Reduction Measures.

As we have stated previously, we are perplexed by the statement “The Imperial Beach CAP is not currently set up to be used for CEQA review of plans and projects. It was developed in parallel to the Imperial Beach General Plan and LCP update and is a stand-alone document.” All other CAPs that have been approved or are in preparation within San Diego County have been made part of the local jurisdictions’ General Plan as the mechanism to mitigate GHG impacts and are therefore assured to be funded, implemented and enforced. Absent that same level of integration into the City’s General Plan (and where relevant into the LCP), the CAP could be interpreted to be a non-binding aspirational document. If that is not the case, then the City must fully explain how it intends to assure its funding, implementation and enforcement so that the City complies with GHG emission reductions that are conforming to state laws and orders – at least out to 2035 (a target year for the RTP).

C-16

C-16 The CAP has been included as part of an extensive work program that includes the GP/LCP update and the City has allocated as many fiscal and personnel resources as possible to complete it. The CAP is primarily intended to reduce GHGs. Additionally, the LCP/GP does not include any Citywide intensification of land uses so it is not needed to mitigate the GP/LCP update. The only proposed land use change is to re-designate the Salt Ponds 10A site from Urban Reserve to Open Space, which would not cause any impacts. This idea may be revisited in the future should the City deem it necessary and resources are available.

The CAP proposes to focus GHG emission reduction in four areas (On-Road Transportation; Energy; Waste; Carbon Sequestration) by applying five strategies (Clean and Efficient Transportation; Reduce Vehicle Miles Traveled (VMT); Increase Renewable Electricity; Zero Waste; Carbon Sequestration). Nine measures are identified within those five strategies. We concur with the identified strategies and measures, but recommend that additional measures be included in the CAP. The current CAP only attempts to “close the gap” between the projected BAU/ABAU emissions and the (2030) target year

C-17

C-17 The City’s priority in establishing the CAP is to have a document with local measures and 2030 target reductions that is achievable within the City’s fiscal and staffing resources constraints. The City recognizes the importance of continued planning for post-2030 reductions and has committed to at least one CAP update prior to 2030. As part of that update the City will evaluate the need for additional CAP measures and plan to meet additional codified state targets.

emissions. However, the City has more potential to reduce GHG emissions. And by pursuing that potential, the City will be more likely to be on a trajectory to meet the 2050 goal.

On-Road Transportation Measures. As noted previously, the City's GHG emissions are disproportionately attributable to (commuter) vehicle use. Because federal and state measures are expected to significantly reduce transportation and electric energy-related emissions, the City's CAP does not place much emphasis on local measures that could further reduce emissions. Investing in clean and efficient transportation attributed to the local share of EVs (Measure T.1 – adding 100 EV charging stations) appears to add charging stations in proportion to the expected percentage of EVs apportioned to IB based on statewide and regional EV projections (Appendix B, Table 10 and related text). It isn't clear how many charging stations would be installed by 2030 absent this measure beyond a "business-as-usual" rate. How does this "measure" increase the already-anticipated rate of EV presence in Imperial Beach? Also, this measure is not a mandate, rather it only states the City will "examine options" and "support, encourage and incentivize" this measure. Other measure the City could adopt would be to increase additional EV ownership by committing to provide incentives to install charging units and adding rooftop PV at residences.

The CAP should evaluate and include parking measures. Studies have demonstrated the potential benefits from, and many jurisdictions have adopted, "unbundling" parking to reduce VMT and increase opportunities for improved commuting: <https://parkingpolicy.com/reduced-requirements/>. We recommend the CAP include such measures, whose benefits apply to the general public, employees and employers.

The high rate of vehicle commuting (95% commute outside the City) and low rate (4%) of transit ridership by City residents suggests that the CAP should place greater emphasis on improved transit access and service – particularly linked with similar efforts by other cities' through their CAPs and the RTP. IB should coordinate through SANDAG to enhance in-City access to (rapid) bus and trolley services, particularly for the 95% of commuters who leave/return daily. Imperial Beach is served by three primary local bus routes (901, 933 and 934) and a BRT (925 route to Otay Mesa) is planned to be added. But convenient access to bus stops (1/4 mile or less), for both within-City and external travel, should be improved. Also, demand-response and flex route service options, using EVs, should be considered for implementation.

Other VMT-reducing measures the City should consider adding include promoting land use and density changes that lessen the need for vehicle use.

Energy Emissions Category. The CAP identifies a renewable energy target of 75% by 2030 and "...is committed to connecting its residents and businesses to these resources to improve energy efficiency in existing residential units and commercial uses" (page 32 and Table 4.5), but does not identify any energy efficiency measures (page 7). Many cities in the San Diego Region have adopted 100% clean energy goals by 2030/2035 (<https://patch.com/california/encinitas/encinitas-5th-city-region-adopt-100-clean-energy-target>) and we recommend that Measure E.1 be revised a 100% clean energy goal by 2030 or at least by 2035.

- C-18 The City will take an active role in increasing the number of EV charging stations in the community to support the use of electric vehicles. Measure T.1: Increase Citywide Electric Vehicle Charging Stations (EVCSS) states that the City will work to increase the number of charging stations at public and private facilities. For private development, the City will work through its discretionary review process to increase the number of charging stations. It will also identify opportunities at public facilities for installations. Finally, it will also identify and pursue funding and financing through state and regional grant funding opportunities in collaboration with partner agencies. The reductions quantified are based on the penetration of electric vehicles as a result of the State's ZEV program and the estimated VMT associated with those vehicles. Measure T.1 would provide infrastructure that would support a portion of that VMT as a direct result of City actions. The City will monitor its progress implementing Measure T.1 and adjust achieve the installation of 100 charging stations as necessary.
- C-19 The City recognizes the importance of parking policy as a means to reducing GHG emissions, in addition to other co-benefits, and has included a number of parking policies in the LCP/GP Mobility Element. Parking management policies include Policy 3.5.1 to "Provide and manage parking so that it is reasonably available when and where it is needed," Policy 3.5.4 encourages shared parking and Policy 3.5.5 encourages the inclusion of Transportation Demand Management strategies and shared parking in commercial and mixed-use districts. The City will evaluate the inclusion and GHG reduction quantification of parking measures as part of future CAP updates.
- C-20 The comment notes the City's high commute and low transit ridership rate and the need to improve transit access and service. Measure T.3: Increase Mass Transit Ridership and Measure T.4: Improve Bicycle and Pedestrian Facilities, have beneficial impacts on transit access and service. In addition to supporting the MTS 925 Rapid bus route, the City is undertaking extensive bicycle and pedestrian improvements that will improve access to transit. The description of Measure T.4 has been amended to note the beneficial transit access impacts that this will have. Additionally, as noted in response C-10, a supporting effort has been added to Measure T.3 stating that the City will collaborate with SANDAG to ensure the RTP includes transit improvements.
- C-21 The LCP/GP update was focused on providing policies to address sea level rise resiliency and other policies as needed to conform to changes in state law. The update does not include any intensity or density increases. The only proposed land use change is to redesignate the Salt Ponds 10A site from Urban Reserve to Open Space. The City's upcoming Housing Element update would be the appropriate work program to consider residential density changes.
- C-22 The City has placed a priority on a CAP that is implementable with an achievable 2030 target. To implement Measure E.1 the City will partner with other jurisdictions to evaluate the potential to join a CCE program. The City does not have the resources to establish its own. No regional or multi-jurisdictional CCE is currently in place it is not known what renewable energy mix options will be available and at what cost. Because of this uncertainty the City has set a 75% target; however, the City will evaluate options associated with a CCE and may elect to supersede this with a higher target should it be feasible. Furthermore, having committed to at least one CAP update by 2030, there will be an opportunity to increase this target. The comment also states that Measure E.2: Increase Commercial Behind-the-Meter PV is only an exploratory measure. In actuality the City will achieve the stated increase in Solar PV through requirements or incentives, make zoning and code changes to encourage solar ready developments, and increase access to solar PV funding sources.

The CAP identifies that 17% of its GHG reductions will derive from increased grid-supplied renewables. states that the City will explore options to increase grid-supplied renewable electricity which could include joining a regional CCE program. It also identifies new solar PV on new and redeveloped commercial projects and consideration of solar PV at existing public facilities. If the City is only required to explore this measure, then it is not an enforceable commitment to achieve the stated reduction.

Aligned with a 100% clean energy goal, we strongly recommend the City make a commitment to establish or join other cities to adopt a Community Choice Aggregation (CCA) program. CCAs are emerging as the most likely means to achieve significant (built environment) energy reductions (<https://cleanpowerexchange.org/resources/cca-101/>; [https://www.cityofberkeley.info/uploadedFiles/Council_2/Level_3_-_General/100%20RE-CCA%20Study-October%202018\(1\).pdf](https://www.cityofberkeley.info/uploadedFiles/Council_2/Level_3_-_General/100%20RE-CCA%20Study-October%202018(1).pdf)). Furthermore, SDG&E has announced its intention to leave the electricity power purchase business (<https://www.voiceofsandiego.org/topics/government/sdgee-is-looking-to-leave-the-power-buying-business/>), which is further reason for the City to begin to develop a (or join a regional) CCA program.

C-22
Cont.

Carbon Sequestration Category. We support the City's intention to use carbon sequestration as a GHG emission reduction measure. However, we recommend that Proposed Measure S.1 be revised to require the preparation of an Urban Forest Management Plan within two years of CAP approval. The City should use the recently developed Urban Tree Canopy data and reports (<https://sdrufc.com/2018/04/24/tree-canopy-maps-and-data-workshop/>) as the basis for preparing the urban forest management plan and to determine how many and where tree planting would be most effective.

C-23

C-23 The comment to develop an Urban Forest Management Plan will be considered as a follow-up item after GP/LCP adoption, in association with City budget discussions. To formalize this intent, identification and pursuit of a funding sources has been added as a supporting effort to Measure S.1: Tree Planting.

The City will be significantly impacted by sea level rise/coastal flooding. The City should consider adding to the CAP – consistent with its SLR Assessment Report's findings – policies that will require the City to evaluate and establish where coastal carbon sequestration opportunities can be created. Such as, coastal areas where SLR flooding is anticipated – and potentially managed retreat may occur - could be where wetland sequestration sites are established. While it may be premature to provide specific measures and reduction targets, the City should explore the potential for synergy between the CAP and SLR actions. The Tijuana River Natural Estuarine Research Reserve/Borderfield State Park comprise a huge federal and state investment and their staff are instrumental in addressing sea level rise, developing coastal adaptation recommendations, and field testing approaches in this area and other southern California coastal areas. This CAP should fully coordinate with and utilize information and resources available from those entities (e.g., http://trnerr.org/coastal_training/).

C-24

C-24 Measure S.1: Tree Planting includes a supporting effort to identify carbon sequestration opportunities. The City will continue to collaborate with relevant federal and state agencies such as TRNERR. Language has been added to the measure noting that sea level rise adaptation is an important potential co-benefit and should be considered in identifying and evaluating such opportunities.

Waste Emissions

The CAP identifies a target of 80% reduction in waste-generated GHG emissions by 2030 and a City policy for Zero Waste by 2050. Although the City can pass a Zero Waste policy, it relies on contract service to provide solid waste removal. The CAP states that the contract service is responsible for achieving the state waste reduction target (75% by 2020), and that the current contract service has states that the target of 80% reduction by 2030 aligns with the company's intentions.

C-25

C-25 The City will adopt its Zero Waste Policy in the near-term (before 2030); however, The City's waste hauler is the primary implementer of the measure. The City's waste hauler must abide by state law, so no formal commitment is necessary. The CAP will be monitored for effectiveness in meeting emission reduction targets and the City will work with the waste hauler to support effective implementation.

To provide the necessary certainty that those measure will be implemented, the City (its CAP) must specify when it will implement its Zero Waste policy (“near-term” is not sufficient) and a formal commitment to have its contract service achieve the 80% reduction – as there is no assurance that the current service will be the provider by 2030.

Other Mitigation Measures

The CAP does not include, but should consider adding, water and waste water-related measures such as reducing outdoor landscape watering and increased water efficiency in new/redeveloped/remodeled residences.

Also, as stated previously, the CAP references additional measures that the citizens and businesses would implement, but does not describe them or their potential/anticipated GHG emission reductions. And, as described in Appendix D (Consolidated Measure Implementation Action Matrix), all of the current measures are the responsibility of the City. What are those additional measures/actions and how are they expected to affect the CAP reductions?

5.0 CAP Monitoring and Updates

This section discusses but does not commit the City to specific timelines for monitoring effectiveness or updating the CAP. We recommend that the City produce an annual monitoring update of the status of implementation for each measure. The GHG inventory must be updated in 2020 to confirm that the 2020 target is being met, and we concur with the CAP suggestion for updating it every two years (if a regional approach is taken to GHG inventory updates, that could replace this interval). In addition, because state and federal GHG policies are likely to change in response to new climate science and GHG reduction technologies are always changing, we strongly recommend that the CAP be updated every three to five years.

We recommend that the information provided in Appendix C (CAP Measure Cost Overview) and Appendix D (Consolidated Measure Implementation Action Matrix) be combined into a single table. In addition, the specific City departments that are responsible for implementing each measure must be included in the combined table.

Adaptation

Adaptation measures should be included in Climate Action Plans because the effects of (threats from) climate change cannot be fully avoided and minimized. The State of California has produced guidance in developing adaptation strategies and implementing actions (http://resources.ca.gov/docs/climate/01APG_Planning_for_Adaptive_Communities.pdf). Each urban area will face different timelines and intensity/severity from climate change threats. The CAP should at a minimum discuss the current, near-term and longer-term adaptation measures the City plans to implement and implementation timelines. Among the reasonably foreseeable threats are increased heat risks (which disproportionately affects elderly, health-compromised and lower-income residents); changes in disease risks (particularly vector-borne ones); interruptions of the power grid - in addition to

C-26

C-26 The LCP/GP update includes a number of policies focused on drought tolerant landscaping and water efficiency (see Section 6.8). Existing City efforts and other related requirements were deemed to result in a minimal reduction in local GHG emissions and were therefore not included. Such measures could be included in future CAP updates if their effectiveness increases.

C-27

C-27 The draft CAP states that emissions inventories are recommended in 2020 and every two years thereafter. The City appreciates the comment and the need for a firmer commitment to regular inventories and monitoring. In response to the comment the CAP has been amended to state that the City will complete an inventory update in 2020 and one every two years thereafter. In conjunction with the inventory updates the City will report on the implementation progress for each of the measures and the CAP overall. Additionally, the City commits to complete at least one comprehensive CAP update before 2030. An additional CAP update could be completed before 2030 pending the availability of resources.

C-28

C-28 The City recognizes the importance of climate adaptation and has included adaptation policies, strategies, and approaches in the draft General Plan. For example, the draft General Plan addresses the impacts of climate change and stressors such as sea level rise, urban heat island effect, air quality, and drought. In response to the comment, edits are underway to: expand the “Discussion” related to Section 4, and revise Table CE-1 to more clearly identify and reference proposed General Plan policies that will foster resiliency and guide adaptation strategies over time, and to add a policy on extreme heat/urban heat island. In addition, the scope of work for future CAP updates are anticipated to more fully address climate adaptation.

coastal/sea level rise risks that the City addresses in its SLR Assessment Report. An example from the City of Richmond (CA) is a useful model (<file:///G:/SWIA/City%20of%20Richmond%20CA%20Appendix%20F%20Adaptation%20Study.pdf>).

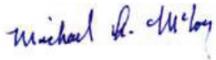
The primary focus for the City's SLR Report was to analyze vulnerability to climate change along Imperial Beach's Pacific shoreline (open coast), though it does assess potential effects further inland. The SLR report identifies adaptation measures that could be implemented through changes in Land Use, Transportation, and Public Transportation. The CAP should provide a more extensive discussion about which climate change-related effects pose the greatest threats to the City and an evaluation of what approaches and actions it will consider implementing to reduce those threats.

Summary

SWIA supports the City's intentions to reduce GHG emissions that align with the state's targets. However, the CAP is incomplete in terms of what is needed for it to be effective, implementable, and enforceable. Incorporating our preceding comments and recommendations would greatly improve its effectiveness and utility as the means for the City to reduce GHGs, facilitate development, and anticipate future changes that will best implement the General Plan.

We are available to discuss our comments and recommendations with the City. Our contact is Bill Tippetts (billtippetts@gmail.com).

Sincerely,



Michael A. McCoy, President



Bill Tippetts, Board Member

C-28
Cont.

C-28 Adaptation policies, strategies, and approaches are included in the draft General Plan. Edits underway to Table CE-1 to reference General Plan policies that will foster resiliency and guide adaptation strategies over time. The City recognizes the importance of climate adaptation and focused its resources to ensure the LCP/GP addresses the impacts of climate change and stressors such as sea level rise, extreme heat/urban heat island effect, air quality, and drought. Future CAP updates will more fully address climate adaptation.

C-29

C-29 The comment is concluding in nature. The comment does reiterate the focus of the letter but those are elaborated on further in the body of the letter and are addressed in the responses above.

LETTER D

From: Eric Syverson [mailto:esyver.17@gmail.com]
Sent: Friday, March 22, 2019 10:14 AM
To: Jim Nakagawa <jnakagawa@imperialbeachca.gov>
Subject: Negative Declaration for LCP

Mr. Nakagawa,

My name is Eric Syverson I am native to Imperial Beach. I am emailing regarding the LCP and other plans. I do not understand how the City can support the redesignation of Pond 10a to Open Space. This is a flood disaster waiting to happen and our newest and largest development is in real flooding danger. This is indicated in the SLR produced by Revelle Coastal. Pond 10a also exposes our main arterial route HWY 75 to tidal flooding. As a concerned resident it seems the redesignation of this Pond puts both residents, property and city infrastructure at risk. I oppose any redesignation of Pond 10a. Among many other areas of these plans, I will begin to analysis from a CEQA perspective. Also to ask residents to pay for hardcopies of plans is prohibitive.

Thank you,
Eric Syverson

Thank you

D-1
D-2
D-3

- D-1 This comment was received prior to the public review period for the IS/ND and does not comment on the content of the IS/ND directly. This comment states concerns regarding rezoning of Salt Pond Marsh 10-A from Urban Reserve to Open Space. The IS/ND states that the rezoning of Salt Marsh Pond 10-A to Open Space preserves the biodiversity and habitat restoration that has taken place within the pond. The City emphasizes open space and conservation planning as fundamental components of the Imperial Beach GP/LCP. By redesignating Salt Pond 10A from Urban Reserve to Open Space, the land would be environmentally protected and carefully managed. Although limited uses of Open Space are allowed through a CUP, future development of the area would be highly constrained.
- D-2 As stated in comment D-1 the Salt Pond Marsh is a sensitive wetland protected under state and federal regulations. The City acknowledges that coastal flooding is increasing due to sea level rise and climate change. However, re-designation of Salt Pond Marsh 10-a to Open Space would not increase coastal flooding hazards. The GP/LCP contains policies which propose measures to prevent flooding, such as raising existing infrastructure and structures, and the adaptation of stormwater and wastewater systems (Policy 7.1.4a). These changes would primarily occur within existing developed areas. As stated above, the GP/LCP and CAP propose measures that could alter existing drainage patterns; however, the projects would largely occur where drainage patterns already exist and would not result in substantial flooding on- or off-site. Additionally, the GP/LCP requires that impervious surfaces are minimized in areas of new development and redevelopment and, where feasible, slow runoff and maximize on-site infiltration of runoff (Policy 8.3.8a).
- D-3 According to CEQA guidelines 15045(b) "a public agency may charge and collect a reasonable fee from members of the public for a copy of an environmental document not to exceed the actual cost of reproducing a copy."



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

LETTER E

April 24, 2019

Jim Nakagawa
Imperial Beach, City of
825 Imperial Beach Boulevard
Imperial Beach, CA 91932

Subject: City of Imperial Beach General Plan/ Local Coastal Program Update and Climate Action Plan
SCH#: 2019039143

Dear Jim Nakagawa:

The State Clearinghouse submitted the above named NEG to selected state agencies for review. The review period closed on 4/23/2019, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act, please visit: <https://ceqa.net.opr.ca.gov/2019039143/2> for full details about your project.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

E-1

E-1 The commenter notes that the comment period is closed, and no comment letters were received. The project complied with the State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit review requirements for draft environmental documents, according to the CEQA. The comment does not contain any substantive statements or questions about the IS/ND or the analysis therein, and no further response is necessary.