



City of Imperial Beach, California

OFFICE OF COUNCILMEMBER EDWARD SPRIGGS

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ATTACHMENT 4

May 8, 2019

Andy Hall, City Manager
Steve Dush, Assistant City Manager
City Hall
Imperial Beach, CA 91932

Subject: The Future of Imperial Beach

Dear Andy and Steve:

I believe the time has come for me to put into writing comments I have made to each of you during meetings or in comments on documents, such as our LCP/GP update. I write this letter in my capacity as a Councilmember, as former Chair and current member of the Housing, Community and Economic Development Policy Committee of the League of California Cities and as a former HUD Community Development officer.

Based on my work within the League, including the views expressed by elected and staff leaders and the 70 or so members of the HCED Policy Committee, California Cities and their locally elected officials today are facing unprecedented challenges from recent and newly proposed state legislation to our ability uphold land use and other regulations at the local level.

We are at a critical juncture in Imperial Beach's history. While we are developing an updated General Plan and Local Coastal Plan for our community's approval, we are at the same time facing highly invasive state legislation on housing that gives developers the *right* to ignore local height, density, parking and other local land use controls. GIVEN OUR PLEDGE TO MAINTAIN AND ENHANCE IB AS CLASSIC SOUTHERN CALIFORNIA, THE CITY GOVERNMENT CANNOT IN MY VIEW SIT IDLY BY AND JUST LET THE MARKET AND STATE INITIATIVES DICTATE A HIGH-DENSITY FUTURE NO ONE IN IB WANTS.

I included these concerns in my initial comments on the GP update last month (attached). Those comments suggested that the onslaught of state mandates and pro-developer "by right" bills, plus existing "by right" transit corridor density bonus legislation with their typical applicability within one-quarter mile of major transit stops, could allow high density development *within* our residential neighborhoods (for example, 1/4 mile south of Palm-Rt. 75 is half way to IB Blvd). Again, these State density bonuses give developers the *right* to build 55 feet or higher with limited or no parking requirements.

I firmly believe that IB's self-defense needs to start NOW and should include a high-density containment strategy that *channels* as much of this state-driven high-density development as possible to limited areas of IB thereby minimizing its impact on neighborhoods and the character of this community. Measures to consider might include:

1. **Determine where we can best tolerate a cluster of high-density mixed-use buildings** and adopt measures to channel "by right" developers to such area(s). I propose 13th and Palm because

it is on the edge of IB and at a likely transit stop that we can defend as our closest qualifying transit stop to the trolley line and employment centers to the north.

2. **Reduce or eliminate our local density bonuses everywhere else** in the CMU-1 and CMU-2 zones to prevent future developers from taking advantage of *both* State and local density bonuses. Our local density bonuses are no longer *needed* given that IB has been *discovered*. More importantly, local density bonuses are no longer *appropriate* because the State has chosen to occupy this field, something NOT contemplated when our local bonuses were established as part of our zoning ordinance about 8 years ago.
3. **Recognize that developers will be most attracted to qualifying transit locations closer to the beach**, such as Palm-Rt. 75 west of 9th, and possibly Old Palm and Seacoast, in the MU-2 Zone, where their third stories and higher will have ocean views. (Their density-qualifying “affordable” units will probably be on the lower floors.) As stated above, local density incentives should be immediately re-evaluated, reduced or removed for these areas.
4. **Identify *super-incentives* for development elsewhere**, in areas where high density development is less impactful on community character – such as 13th and Palm.
 - a. These areas are where we intentionally permit State *PLUS generous new* local density incentives to apply. Other super incentives might include:
 - b. Fast permit processing guarantees,
 - c. Express transit service to the trolley and beach (negotiated with MTS),
 - d. City willingness to expand water and sewer lines and/or reduce per unit charges for these services,
 - e. City willingness to participate in cost of other infrastructure improvements necessary to accommodate increased density, such as widening roads and sidewalks, etc.
5. **Identify *constraints* to high density development** in areas where State density incentives may be applicable and ensure these constraints are *not alleviated*, including possibly:
 - a. Existing sewer and water lines already at or near full capacity,
 - b. Consider adopting noise, pollution and public health standards that discourage high density development e.g., in CMU-2,
 - c. Consider working with community groups to mobilize early and vocal opposition to developers proposing high density projects other than where planned by IB. (This means the City needs to inform Councilmembers and residents *early* in the process, a new practice for IB.)

There are probably many other ideas you might develop, given your experience and expertise. My sincere hope is that these suggestions stimulate your thinking and if some of them seem infeasible or otherwise not to your liking, that you will propose alternative approaches that would better protect this community. Doing nothing in the face of these external legislative challenges is just not an option. I look forward to your considered response.

Best regards,

Ed Spriggs

Attachment

*Thanks for all you
do for our City*

**COMMENTS ON LCP/GP LAND USE PLAN
FINAL DRAFT DATED 3-25-19
ED SPRIGGS 4-23-19**

GENERAL

Excellent draft incorporating needed elements for Coastal Commission approval, while documenting critical focus on tourism/ecotourism as (1) public/access-serving, (2) IB's incentive for protecting the coastal environment and (3) essential for IB's economic development and viability along with protection of coastal public and private property. Consistent with this balanced economic-environmental approach, the elimination of managed retreat as a potential adaptation strategy to be considered within this LCP should enable the community to focus on more relevant short- and medium-term adaptation strategies and other extremely important land use issues that address community priorities without politicizing the process. Specific comments follow.

P I-6: MISSING ESTUARY DESCRIPTION. WE NEED TO DESCRIBE TIJUANA RIVER ESTUARY IN SAME TERMS AS SAN DIEGO BAY UNIT OF THE SAN DIEGO NATIONAL WILDLIFE REFUGE. Seems like a natural item that was cut or inadvertently omitted since the top paragraph begins with Imperial Beach is bordered to the north . . .” but nothing about the similar reserve to the south.

This omission, what the estuary is and how part of it evolved into the TRNERR, etc., is glaring in the General Plan key features Conservation and Ecotourism section, third bullet, part I-8, which talks about “IB’s longstanding commitment to preserving and enhancing the San Diego Bay and Tijuana River Estuary for their ecological and open space values.” The uninformed reader has had some background on the Bay but not the Estuary.

P. L-1 **Typo** in goal one 2nd bulled vibrant mixed-use residential AND commercial districts.

L-2 POPULATION GROWTH PROJECTIONS. The reference to SANDAG population projections is likely based on regional growth forecasts apportioned to the various municipalities without regard to their available land, development plans or community characters. The 10K population increase projected for IB by 2050, about a 40% increase, is *totally* incompatible with IB’s mission statement (“Maintain and enhance IB as Classic Southern California” etc) and available land, UNLESS we plan to allow high rise residential development in large quantities

along the main Rt 75 Corridor OR totally transform the single family neighborhoods. WE MUST PUSH BACK ON THIS AS WELL AS OUR RHNA NUMBERS NOW AS PART OF THIS GP UPDATE, WHICH IS THE GUIDING DOCUMENT FOR OUR HOUSING ELEMENT!

L-8 SUSTAINABLE DEVELOPMENT POLICIES MAY NOT BE SUSTAINABLE. 2.2.4. re: higher intensity residential development needs (a) a modifier like reasonable or consistent with community values and (b) to define “proximity” to transit access given state legislation that allows “by right” high density ¼ mile from transit stops. This is a LARGE distance in IB that would cut deeply into single family areas – ¼ mile is half the distance between Palm and IB Blvd. Therefore, we should define proximity as **adjacent or within one block of a major transit stop**. See also 2.3.3. and 2.4.3 (“proximity”).

We should also create incentives that effectively limit our highest density area to 13th and Palm, ONLY, and make it attractive for developers to choose THIS area for use of their State density bonuses allowing 55 feet or more and little or no onsite parking, rather than the entire Palm corridor or other parts of IB that will more invasively violate our Classic Southern California vision.

To reiterate, we need to define the *super density* area(s) ourselves and incentivize developers that use State “by right” density bonuses to locate where *we* want them, not *anywhere* within ¼ mile of a major transit stop as current and likely future legislation will allow. We can seek to limit the super density damage to one area by zoning it for transit oriented development (TOD), collaborate with MTS to create nice bus stops and express service to the trolley line from 13th and Palm, and possibly also the beach on a seasonal basis from this location, and offer additional density incentives of our own just to contain *super density* development to one area.

2.4.5 suggest adding: “e” Collaborate with MTS to create transit hub for express service east to the trolley, for example, on week days and west to the beach on weekends during beach season.

L-10 INCONSISTENT TREATMENT OF SEACOAST OVERLAY ZONE
2.4.6b exceptions provide protections to this residential area grandfathered into MU-2 zone, BUT 5.2.11 concerning city “vacation” of these areas for public purposes seems totally inconsistent. I do not know where this “vacation” concept came from but believe it should be DELETED. If left alone, it can and likely will

become controversial as inconsistent with the residential overlay zoning and the wording of the 2.4.6b subparagraphs.

L-13 NOLF NOISE 2.2.6 should be modified in light of prior community experience and challenges when NOLF use intensifies or flight patterns change by stating things more affirmatively, e.g., Explore with the Navy additional noise reduction strategies to benefit residents, visitors and sensitive wildlife habitats, including endangered species.

M-7 ARTERIAL THOROFARES Applicable streets should not be only SR 75 east of 7th but also IB Blvd east of 9th consistent with the truck route. Retain 4 lanes east of 9th to avoid rush hour congestion and facilitate emergency and major event egress. The majority of residents who live along or south of IB Blvd support 4 lanes.

CE-14 CITY FLEET 4.5.4. should explicitly include electric vehicles

P-16 COASTAL TRAIL 5.2.27 should include IB maintaining (re-establishing) its membership in the Coastal Trail Association.

S-1 ADD BEACH EROSION This significant impact is missing from the *background statement* and should be included as a clear ongoing element independent of SLR.

S-2 REVETMENTS AND SEAWALLS COVERAGE The second paragraph states that these protect MOST of the beachfront properties in the city. We need to quantify this to, say, 95 percent, and generalize it to the *IB shoreline*, to get away from the parcel by parcel approach which is not a viable approach for comprehensive shoreline protection and management. This becomes highly relevant in the Shoreline Protective Devices section around 7.1.6. See comments below in that section, page reference S-11.

S-3 ADAPTATION STRATEGIES DISCUSSION BOX This reference should be changed from “the” discussion box to “that document’s” discussion box for clarity. I looked for it in the current document, others may also.

S-4 ADAPTATION TIMELINE Suggest that in the last paragraph “near term” should be replaced by “near-to-medium term” because that framing more accurately covers the range of adaptation strategies mentioned, including dunes

and is appropriate given that adaptations are going to be based on event and data “triggers” rather than time-line driven.

S-8 MORE ON ADAPTATION TIMELINE Closely related to the above point, the *second* paragraph on S-8 discusses Table S-1 and the fact that the impacts associated with various levels of SLR are based on the expectation of NO further adaptation measures. The corollary is that impacts will change as new or additional adaptation measures are implemented, making future time-based predictions even harder to specify *at this time*. THEREFORE, the following additional sentence is suggested after “These potential impacts could be mitigated in part or in whole with additional adaptation efforts.”

“In other words, such additional adaptation efforts will impact the trigger points and timing for the next round of adaptation measures in ways difficult to predict or assign timelines to in this LCP.”

S-8 MORE ON USE OF DATES The implication here is that we should consider eliminating the years (2047, 2069, 2100) from the chart, or at least use “approximate” before each date, which still could be misleading and may end up being very wrong with reference to what actually happens in the future on the SLR, impact and adaptation fronts.

Similarly, in the third paragraph on S-8, the reference to events “around 2047” might best be changed to “around mid-century.”

S-8 MANAGED RETREAT DISCUSSION The discussion in the 4th and 5th paragraphs, and the first paragraph of text on page S-9) is very clear and comprehensive, strongly stating the planned adaptation strategies during the life of this LCP/GP update and clearly stating that MR is not relevant during this time period. For the IB public and the Commission this translates to *IB will protect itself and its environment as long as feasible and not retreat*. The reference in the 5th paragraph to “hybrid strategies” that may be needed earlier for the most flood prone areas in the short term could seem ambiguous to skeptics. I am not sure anything can be done about that; however, we may want to just use the term “more flood prone areas” rather than specific neighborhoods and, by implication, properties.

S-10 DEVELOPMENT DESIGN AND SITING – PARCEL VS AREA APPROACH The first paragraph addresses IB’s low-lying sandy beach and parcel

level adaptive strategies for development and redevelopment. This section needs to take into consideration the fact that every developed coastal property in IB has some form of hard protection, essentially creating a common interest in its maintenance until a new multiparcel adaptation strategy is adopted. Suggest adding to the last sentence: “, taking into consideration impacts on neighboring properties.”

S-10 **TYPO** In the Building on Community Strengths paragraph change “from” to “for” in the 4th line.

S-10-11 **DEFINING TRIGGER POINTS** Establishing and articulating precise trigger points for future monitoring remains a task to be accomplished. Therefore 7.1.3 could benefit from insertion of a new e: establish and clearly define measurable trigger point thresholds based on above factors (a – d). “f” would then read: track progress toward trigger point thresholds.

S-11 **SHORELINE PROTECTIVE DEVICES** Further to my comment on S-2 and the need to state that 95% (or whatever the high percentage is) of IB’s developed shoreline is protected by seawalls or revetments, we need a new 7.1.6 that says something like:

Given that 95% of shoreline development in IB is protected by seawalls and revetments in various states of repair and that the close adjacencies of shoreline properties mean that failure of one revetment could lead to damage to neighboring properties, these hard protections must be treated in some respects as a system from a shoreline management standpoint. Accordingly, the City will address shoreline protective devices both in terms of private ownership and responsibility and the community’s interest. This may have code enforcement and permitting review implications just as renovations or improvements to, or neglect of, property in landward neighborhoods all have a community aspect.

Other sections can be renumbered accordingly.

S-11 **SAND MITIGATION FEE** Again, the second sentence of 7.1.9 allowing these fees to be used for shorter term projects is not prudent policy and *should be deleted* given that sand replenishment was the advertised purpose, sand projects will continue for the foreseeable future, they typically require a local match and are very expensive. Also, the City Council has recently (since the last LCP/GP draft) authorized the pursuing of a new opportunistic sand replenishment program and implementation could occur with a needed local funding component well before a major project is identified.

S-13 REMOVAL AND RESTORATION PLAN While I am concerned about Coastal Commission insistence on these types of provisions, it also seems clear that the original version's requirement for such a plan is more consistent with the reason for having such a provision than is "encourage in the new version. How does one *encourage* something as a *condition* of approval? A better word might be "include." Three criteria seem appropriate, going back to the original version, any one of which would be enough to trigger the removal and restoration clause: abandonment, loss of continuous habitability due to flooding, loss of utility services, etc., and emergency services accessibility.



Mayor Dedina and Council
City of Imperial Beach
825 Imperial Beach Boulevard
Imperial Beach, CA 91932

May 15, 2019

Re: Recommendations for Imperial Beach’s Climate Action Plan (CAP)

Dear Mayor Dedina and Council,

Climate Action Campaign is a San Diego-based nonprofit organization with a simple mission: to stop the climate crisis. We recognize and thank you for your leadership on climate and environmental justice through actions such as filing suit against Big Oil for knowingly causing harm by accelerating the climate crisis, leading the effort to stop the sewage flows that have contaminated Imperial Beach’s beaches and wetlands, and recently, passing the most comprehensive plastics ban in the region.

The city’s Climate Action Plan is an opportunity to continue building on the City’s efforts, by developing a comprehensive climate solutions strategy and implementation plan that meets the scale of the challenge the climate crisis poses and helps bring clean air, safe streets, affordable clean energy, and other benefits to families and businesses in Imperial Beach.

We offer the following recommendations to help ensure that the CAP for Imperial Beach will deliver a safe and healthy future for families in Imperial Beach.

Plan for Carbon Neutrality by 2045 In Line With State Targets

As a long-range planning document, we recommend that Imperial Beach’s CAP planning horizon should extend until at least 2045, and the target for that year should align with Executive Order B-55-18 to achieve carbon neutrality by 2045. The UN IPCC Special Report on Global Warming of 1.5°C and other recent climate science findings show that, at every level of government, we must plan for and fully execute a total transition away from fossil fuels. To achieve that transition, we need all of our cities to establish the roadmap and begin deep decarbonization today.

Set a 100% Clean Energy Target By 2030 And Commit to Community Choice

Six cities in the San Diego region (San Diego, Del Mar, Solana Beach, Chula Vista, Encinitas, and La Mesa) have set 100% clean energy targets by either 2030 or 2035, with a commitment to pursue Community Choice as the means to that end.

Currently, measure E.1 reads, “Partner with neighboring jurisdictions to evaluate the potential to join a regional CCE program and increase the share of renewables of grid-supplied renewable power to 75% by



2030.” We recommend making a firm commitment to 100% clean energy through Community Choice by revising that language to read, “Achieve 100% clean energy by 2030 through Community Choice.”

Community Choice is the only viable pathway to reaching 100% clean energy at the local level, and nearly two dozen programs are operating successfully in over 140 cities across California. Therefore, while the Draft CAP includes actions committing to *exploring* Community Choice, we urge the city to go further and express the intent to join a Community Choice program to meet its renewable energy targets.

Eliminate Building Emissions by 2045 Through Building Electrification

Even as our cities achieve 100% clean electricity, natural gas remains the third most significant source of emissions in our cities, so to fully transition away from fossil fuels, we must identify strategies to reduce and ultimately eliminate natural gas consumption.

We urge Imperial Beach to include in its CAP targets and associated strategies to electrify municipal, commercial, and residential buildings. These targets and strategies should include:

- Reducing GHG emissions from buildings by 40 percent below 1990 levels by 2030 and eliminating building emissions by 2045 through widespread building electrification.
- Requiring or all newly constructed or renovated buildings to be all-electric.
- Adopting a plan to electrify municipal buildings.
- Streamlining permitting to make electrifying existing buildings easier.
- Developing financial incentives to lower purchase and installation costs for electric appliances.
- Creating public outreach and education campaigns to promote building electrification.
- Support workforce development and training programs that promote good-paying careers for technicians that install and service electric appliances.

In addition to reducing emissions, building electrification provides numerous co-benefits including lower energy bills and lower costs for new construction, improved indoor and outdoor air quality, safer energy infrastructure, and the creation of good-paying green jobs.

Energy Efficiency

The CAP should set targets for water conservation and energy efficiency for single-family, multifamily, commercial, and municipal buildings, as well as plan for ordinances to help reach those targets. These ordinances should include a Residential Energy Disclosure Ordinance similar to the one adopted in Portland, Oregon (and called for in the City of San Diego’s CAP), which requires sellers of single-family



homes to obtain and disclose a Home Energy Report estimating the energy-related use, associated costs, and cost-effective solutions to improve the home's efficiency.¹

In addition to reducing emissions, energy efficiency promotes lower energy bills and creates good-paying green jobs.²

Set Mode Share Targets for Biking, Walking, and Transit

In order to hit the state climate targets, Imperial Beach will need to continue shifting people away from driving and towards biking, walking, and transit, as the CAP acknowledges. We recommend setting ambitious targets for the percentage of commute trips that will be made by biking, walking, and transit (known as mode share targets) and identifying strategies to meet those targets.

Biking: The action in Measure T.4 is to add 11 miles of Class II or better bike facilities. Research and experience have shown that Class II bike facilities, which are striped bike lanes without a physical barrier, do not increase ridership as much as physically protected bike lanes. To increase bike ridership and secure safer streets for all, we recommend prioritizing protected bike facilities, not painted bike lanes.

Transit: In addition to the actions listed in Strategy T.3 to support transit ridership, we recommend adding a third action that read, "Support planning and policy decisions at SANDAG to reduce GHG emissions and VMT and increase transit ridership."

Include Strategies to Ensure Equitable Implementation of CAP

As addressed in the draft General Plan Update, environmental justice and social equity play an inherent role in protecting our environment and supporting healthy communities. In order to support the Imperial Beach's current environmental justice efforts, we recommend that the CAP include an Environmental Justice section to ensure that the communities within the City with the greatest environmental health risks from climate change and pollution are the first to benefit from the implementation of CAP strategies. This section would explicitly outline how the CAP will implement the Environmental Justice section of the General Plan. We also recommend the development and implementation of this section take place in consultation with a diverse set of stakeholders from the most impacted of the City's communities.

Commit to Zero Waste

Waste decaying in landfills emits methane, a potent greenhouse gas. The CAP should achieve zero waste through strategies such as eliminating single-use materials, composting, and capturing landfill gas.

¹ City of Portland Home Energy Score, City of Portland, Bureau of Planning and Sustainability, <https://www.pdxhes.com/>

² Ettenson, Lara. "Good News for Good Jobs: Clean Energy Soars." NRDC.org, NRDC, 30 May 2018, <https://www.nrdc.org/experts/lara-ettenson/good-news-good-jobs-clean-energy-outpaces-fossil-fuels>.



Currently, measure W.1 reads, “Adopt a Zero Waste by 2050 policy and work with the City’s waste service company (currently EDCO) to achieve 80% landfill diversion by 2030.” We recommend adopting a Zero Waste policy that commits to 100% waste diversion by 2035.

Fully Electrify the City’s Municipal Vehicle Fleet

The CAP should include strategies to promote zero emissions vehicles (ZEVs) and convert the municipal fleet to ZEVs. While we support that the Draft CAP commits to a fleet conversion plan, we strongly recommend that the CAP exclusively commit to ZEV’s, and not to hybrid vehicles. Currently, measure T.2 reads, “Replace fossil fuel vehicles with Plug-in Hybrid Electric Vehicles (PHEVs) and EVs by 2030, when feasible.” We recommend amending that language to read, “Replace fossil fuel vehicles with EVs by 2030.”

We also strongly support measure T.5, which commits to purchasing 10 electric bikes to reduce municipal employee VMT.

Conclusion

Thank you for the opportunity to weigh in on the development of this critically important document. Imperial Beach’s CAP presents an opportunity to help protect the health and safety of current and future generations from the worst impacts of climate change. We urge you to incorporate the recommendations above to deliver economic, safety, and health benefits, and stave off the worst impacts of climate change.

Sincerely,

Maleeka Marsden
Climate Justice Advocate and Organizer
Climate Action Campaign



Surfrider Foundation, San Diego County Chapter

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July 17, 2018

Chris Helmer
Environmental and Natural Resources Director
City of Imperial Beach
825 Imperial Beach Blvd
Imperial Beach, CA 91932

Re: City of Imperial Beach Local Coastal Plan Amendments

Dear Mr. Helmer,

The Surfrider Foundation is a non-profit, environmental organization dedicated to the protection and enjoyment of the world's ocean, waves and beaches through a powerful activist network. The Surfrider Foundation has over 250,000 supporters, members and activists worldwide. Please accept these comments on behalf of the San Diego County Chapter of the Surfrider Foundation on the proposed Local Coastal Plan Amendments (LCPA) for the City of Imperial Beach (City).

Surfrider Foundation appreciates the hard work the City has invested in the new LCPA. The City's emphasis on reducing emissions and improving transportation accessibility for residents and visitors of Imperial Beach is readily apparent in the development of the LCPA's "Complete Streets" program. The emphasis on both horizontal and vertical coastal access is also consistent with the spirit of the California Coastal Act.

The LCPA policies under 5.2.1 and 5.2.2 to "[m]aintain free public beach access" and provide access to "coastal resources areas for all segments of the population" are important guiding principles for the City to properly exercise its fiduciary responsibilities for managing public trust resources and ensuring environmental justice. While Surfrider Foundation appreciates the City's work in developing its LCPA thus far, we believe there are several elements of the LCPA that would better protect the City's coastal areas and resources consistent with the Coastal Act with the inclusion of additional or stronger policies.

Section 7.2 of the LCPA, "Shoreline Protection/Coastal Hazards & Sea Level Rise Response" states that:

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[s]horeline protection that prioritizes the use of soft and/or living shoreline protection, and actions such as beach nourishment, dune creation/enhancement, wetlands protection, and other similar strategies in conjunction with existing protection devices is the preferred path forward.

Surfrider Foundation agrees that the implementation of climate change and sea level rise adaption strategies using natural and living shorelines is a preferable method of shoreline protection instead of traditional armoring techniques such as seawalls and groins. We have consistently witnessed the detrimental effects of a variety of “hard” or “human-made” shoreline protection strategies. Despite the LCPA identifying soft and/or living protection as the preferred method of shoreline protection moving forward the policy language does not adequately emphasize the importance of these methods.

The LCPA policies under section 7.2 are dominated by the repair, maintenance, and permitting of hard shoreline protection devices. LCPA policy 7.2.1 provides the only mention of soft or living shoreline protection stating that is a policy of the City to “[p]rioritize and encourage the use of soft, natural, and living shoreline protection methods as alternatives to hard shoreline protective devices.” This policy makes implementation of living or natural shorelines aspirational. To improve the effectiveness of this policy, the LCPA should include language **stating** that living or natural shorelines should be the default/preferred alternative whenever projects are proposed related to the construction of new or repair/maintenance of existing shoreline protection.

Additionally, the eleven subsequent policy measures under section 7.2 largely focus on the continued use of hard-armoring or protection methods for the Imperial Beach shoreline. The improved integration in these policy measures of language related to future prioritization of living or natural shoreline protection techniques to replace aging structures would further emphasize the importance of natural methods of shoreline protection.

Another element of the LCPA that Surfrider Foundation strongly urges the City to further amend is the Sea Level Rise Vulnerability Assessment and Planning in section 7.1. Proper planning for sea level rise is critical for the protection of Imperial Beach’s natural coastal resources as well as the economic well being of the City. As a predominantly low-lying, coastal city, the commercial and residential structures of Imperial Beach are particularly at-risk from tidal inundation as sea levels continue to rise. This risk will likely increase in the

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future. Section 7.1 of the LCPA briefly discusses “managed retreat” as a necessary, long-term adaptation strategy where there are “no feasible, cost-effective alternatives.” Relocation is then mentioned under policy measure 7.1.14 to relocate emergency and critical use facilities, if feasible, from high-risk areas of sea level rise. This policy however, does not address the other facilities, commercial and residential, subject to tidal inundation in the future. Areas such as the Seacoast Beach Homes are already subject to regular flooding during high tides. These events pose risks not only to homes and businesses, but to water quality with the risk posed by wastewater infrastructure under inundated buildings and roadways.

Thus, while the LCPA effectively identifies “managed retreat” as an alternative of last resort, current and projected future tidal conditions necessitate additional consideration and planning for managed retreat. Additional policy measures under section 7.1 that require the development of criteria and planning for the use of managed retreat will allow the City to be proactive and have a plan in place should managed retreat become necessary. Due to the extensive impacts of this method of adaptation and the likely costs incurred, it is important that the City be able to act pursuant to a well-developed plan instead of reacting and improvising in the event of an emergency. Consequently, this policy measure requires the development of such planning for commercial and residential properties, in addition to the already included emergency and critical use facilities, for the LCPA.

A third element of concern in the proposed LCPA is the lack of consistency regarding the minimization of impervious surfaces. The impacts of urban activities on ocean water quality is an important health concern for the City and its beach visitors. Storm water runoff from impervious surfaces such as streets and sidewalks degrade ocean water quality posing health risks to ocean users and can hurt local businesses catering to ocean related tourism. The LCPA policy measure 4.6.5 makes it a policy of the City to “[m]inimize the amount of impervious surface and directly-connected impervious surfaces in areas of new development and redevelopment and maximize the on-site infiltration of runoff.” While this is a good start, stronger language requiring use of permeable materials for relevant infrastructure along the City’s coastline would strengthen the intent of this measure.

Additionally, while policy measure 4.6.5 aspires to minimize impervious surfaces for new development and redevelopment, the policy measures under section 6.4 relating to Public Rights-of-Way directly encourage paving certain thoroughfares such as alleyways. This is squarely inconsistent with the conservation measures of section 4.0. Inclusion of language

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in the policy measures of section 6.4 to require the use of water permeable surfaces for the development and redevelopment of public rights-of-ways would make the separate elements relating to conservation and coastal development in the LCPA more consistent. This will also ensure that future development and redevelopment of sidewalks and other public rights-of-way in Imperial Beach are completed in a manner most beneficial for the health of the City's residents and ocean tourists as well as protecting coastal, tourist-driven businesses from the negative impacts of contaminated ocean waters.

Surfrider Foundation again thanks the City of Imperial Beach for its hard work and dedication in developing the proposed LCPA. We hope the above comments prove useful as the City continues to plan for the environmental, economic, and social future of "Classic Southern California."

Regards,

Tyler Hee

Policy Consultant and Member of Beach Preservation Committee

San Diego County Chapter of the Surfrider Foundation

Julia Chunn-Heer

Policy Manager

San Diego County Chapter of the Surfrider Foundation

The Surfrider Foundation is a non-profit grassroots organization dedicated to the protection and enjoyment of oceans, waves and beaches through a powerful activist network. Founded in 1984 by a handful of visionary surfers in Malibu, California, the Surfrider Foundation now maintains over 50,000 members and 90 chapters worldwide. For an overview of the San Diego Chapter's current programs and events, log on to our website at <http://sandiego.surfrider.org/> or contact us at info@surfridersd.org.



April 30, 2019

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

Re: City of Imperial Beach Local Coastal Program Amendments Final Draft

Dear Mr. Nakagawa,

The Surfrider Foundation is a non-profit, environmental organization dedicated to the protection and enjoyment of the world's ocean, waves and beaches through a powerful activist network. The Surfrider Foundation has over 250,000 supporters, members and activists worldwide. Please accept these comments on behalf of the San Diego County Chapter of the Surfrider Foundation on the proposed Final Draft of the City of Imperial Beach (City) General Plan/Local Coastal Program Land Use Plan (LCP or Final Draft).

Surfrider Foundation appreciates the City's continued commitment to promoting coastal access for all, reducing emissions, and utilizing the best available science for adapting to anticipated impacts from climate change. Where the language of this final draft remains the same as the previous draft, we stand by our previous comments dated July 17, 2018.

While there are many positive aspects to the Final Draft of the amended LCP, Surfrider is concerned by the language in Section 7.1, under the heading Sea Level Rise Vulnerability Assessment and Planning, which clearly states that managed retreat is no longer "a viable or necessary adaptation strategy in the foreseeable future." This statement is contradictory to much of the language that precedes it, including the emphasis on planning for a resilient community by utilizing scientific evidence and trigger-based adaptation. While the resiliency measures of "raising of infrastructure and structures, establishment of permanent or temporary alternative routes for public transit and bikeways, green infrastructure that reduces flooding, and addressing drainage of stormwater and resiliency of wastewater systems" are all undoubtedly important, it is worth adding that there may come a time when such structures and systems need to be moved landward due to economic, environmental, and or safety reasons.



As noted throughout the General Plan, Imperial Beach is a predominantly low-lying, coastal city, and its commercial and residential structures are particularly at risk from tidal inundation as sea levels continue to rise. Surfrider Foundation appreciates that the City has included a variety of policy solutions to manage this risk. Particularly the following statement from Section 7.1, Adaptation Timeline and Strategies:

[T]he City's preferred approach is to employ adaptation strategies, such as beach replenishment and living shorelines, in combination with existing shoreline protection devices, to preserve property and maintain critical natural and economic resources such as the shoreline. These strategies will be continually assessed for deployment at the community, neighborhood, area, and sub-area levels.

Surfrider supports the living shoreline and soft armoring adaptation strategies to be implemented where feasible and as a near-term approach. However, for areas that are already experiencing inundation from tidal flooding and storm events, soft armoring may not be sufficient. Continued restoration of hard armoring or implementation of new armoring structures, as described in the policies of section 7.1.6 – 7.1.14 causes further harm to the sandy shoreline and nearshore water quality while only temporarily prolonging the life of the structures they serve.

Current and projected future tidal conditions, exhibited in this and other City documents, clearly indicate that the risk to life and property will only increase with time. While beach nourishment and coastal armoring may presently offer adequate protection for some properties, these methods are not permanent solutions. Eventually the beach will be lost and overtopping by waves of hard armoring structures will likely cause property loss as well. Planning for managed retreat allows the City to protect our beaches for now and the future and helps prepare private property owners to get out of harm's way in a safe and organized fashion when the need arises.

Section 7.1 highlights how "trigger points that include both sea level rise change and impact thresholds can more effectively signal the proper time and scale to implement adaptation strategies." Surfrider agrees that a trigger-based response for adaptation is logical and will help the community efficiently react as changes occur. The intent to base trigger points on "quantifiable data obtained from local and regional monitoring and market indicators" as well as "consistent monitoring of sea level rise and related impacts such as changes in beach quantity and quality and damage to property and structures" is a great place to begin planning. We cannot stress enough that such trigger points are only as strong as the adaptation methods they direct into action. Including managed retreat as a planning tool for long-term protection strengthens the City's adaptation toolkit.



As the City is aware, planning for managed retreat will take time and considerable resources. As such, we urge the City to reinstate managed retreat as a planning strategy in its 2019 LCP Update. The sooner managed retreat strategies are developed the more protected Imperial Beach will be. As the LCP highlights, climate change is a process and the changes are happening in both predictable and unpredictable ways which are creating a multitude of vulnerabilities, especially for coastal cities.

Whether it is a part of this version of the General Plan and Local Coastal Program update or a separate study, retreat must be considered. While the need to retreat may not be immediate, the science is irrefutable; retreat will eventually be necessary. This retreat can happen in a managed way that protects people and property, or in an unmanaged way, that puts property and public safety at great risk. Planning ahead will save the City money and protect the welfare of residents and visitors, while increasing the likelihood that the sandy shoreline of Imperial Beach will remain for future generations to enjoy.

Thank you again for the time and hard work spent on developing this update. Surfrider Foundation San Diego Chapter appreciates the City's consideration of these comments and hopes to see the concerns of our members reflected in the final updated City of Imperial Beach General Plan/Local Coastal Program Land Use Plan.

Sincerely,

Tyler Hee
Surfrider Foundation San Diego Chapter
Policy Consultant and Member of Beach Preservation Committee

Kaily Wakefield
Surfrider Foundation San Diego Chapter
Policy Coordinator



COMMENT CARD

Comments e-mailed 4/25/19 @ 11:25 AM to
Steve Dush, Andy Hall & Tyler Foltz

environment, economy, and social character of the City. The checklist provides a framework for the collection and evaluation of monitoring data that can be used to maintain up-to-date include information on vulnerabilities. This data driven approach will ~~allow~~ for continued community engagement to aid in policy making direction.

recently

The 2016 City of Imperial Beach Sea Level Rise Assessment (IB SLR Assessment) provides sea level rise estimates based on ~~current~~ science. As the science evolves and human and natural factors change sea level rise, these estimates will change. Additionally, it has generally been storms and the resulting coastal erosion, flooding, and property damage that have driven historical adaptive responses such as the construction of groins, the construction of hard armoring protection devices, and periodic beach nourishment. More frequent and powerful storms combined with sea level rise resulting from climate change ~~will~~ increase this episodic damage potential while tidal inundation will become more frequent and persistent and impact private and public property. The IB SLR Assessment found there are public infrastructure components, including but not limited to

Potentially,

would



Past storms have resulted in adaptive responses such as the construction of hard armoring protection devices.



South Seacoast

pot

General Plan Edit – Sea Level Rise Edit 4/16/19 (Safety Element page S-4)

submerged lands along Imperial Beach including Imperial Beach Pier and Pier Plaza, Dunes Park, and street endings as shown in Figure S-1A and Figure S-1B. Imperial Beach is not equipped with the funding or authority to handle sea level rise on its own. Sea level rise requires a broader systems approach in addition to the policies and programs the City can implement of its own accord.

An important component in the long-term capacity of Imperial Beach to adapt to an increase in hazards associated with sea level rise is a regular reassessment of the amount and rate of change over time as well as physical impacts from flooding, storms, and tidal inundation. This will be influenced by future emissions levels and other global and regional factors. Utilizing the best available science is necessary to more fully understand future risks.

be able a potential measurable

THE ADAPTATION TIMELINE AND STRATEGIES

potential

The timing of adaptation strategies will need to respond to these regular reassessments. Rather than set a hard timeframe for adaptation strategies, it is important to base them on trigger points using quantifiable data obtained from local and regional monitoring and market indicators. Consistent monitoring of sea level rise and related impacts such as changes in beach quantity and quality and damage to property and structures are necessary to identify trigger points and the adequacy of existing and potential future adaptation strategies. The triggers are not yet identified or quantified as the need to establish a baseline set of data through a process-oriented methodology is necessary. The methodology will be aided by the Sea Level Rise Strategy Checklist, which is designed to monitor the impacts of SLR on the various areas of the City and identify strategies that provide the best options to preserve and enhance the environment, economy, and social character of the City. The checklist provides a framework for the collection and evaluation of monitoring data that can be used to maintain up-to-date information on vulnerabilities. This data driven approach will allow for continued community engagement to aid in policy making direction.



Past storms have resulted in adaptive responses such as the construction of hard armoring protection devices.

The 2016 City of Imperial Beach Sea Level Rise Assessment (IB SLR Assessment) provides sea level rise estimates based on current science. As the science evolves and human and natural factors change sea level rise, these estimates will change. Additionally, it has generally been storms and the resulting coastal erosion, flooding, and property damage that have driven historical adaptive responses such as the construction of groins, the construction of hard armoring protection devices, and periodic beach nourishment. More frequent and powerful storms combined with sea level rise resulting from climate change will increase this episodic damage potential while tidal inundation will become more frequent and persistent and impact private and public property. The IB SLR Assessment found there are public infrastructure components, including but not limited to

recently



South Seacoast

Potentially,

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MAY 15 2019
PA/PP

To whom it may concern:

First, I would like to thank you for the opportunity to comment on the documents relating to the City of Imperial Beach's future. I would like to limit my comments to the General Plan/Coastal Program Land Use Plan, especially those items pertaining to coastal protection and beach erosion.

I first moved to IB in 1973 and have seen it develop in a very positive way. I have grown up on the beaches of Southern California, playing in the waves as a toddler, son of a waterman, surfed and studied waves, currents and coastal dynamics and served as a beach lifeguard as well. I had a career as a park ranger/naturalist/park manager, first serving along the beach of San Diego County (including Silver Strand, Borderfield and the TJRNERR). I have watched and contemplated more waves than I can ever imagine.

I sincerely acknowledge the work done by City staff and realize the political limitations placed on elected officials but I am generally disappointed in the principal points outlined in the document dealing with coastal protection and beach erosion.

The document is full of wonderful phrases like "natural infrastructure pilot projects", "walkable beaches", "soft and/or living shoreline protection", "dune creation/enhancement" and "resiliency measures".

The document quotes the SANDAG Shoreline Protective Strategy and its four main objectives. First of all "Manage the regions shoreline to provide environmental quality, recreation and property protection". Hopefully, the items listed are in the order of highest priority. This document does identify a problem which has been ongoing for decades. It says nothing about current natural trends abating or even remaining constant, but warns that sea level and associated storm events and natural sand loss due to elimination of downstream sand replenishment will increase.

But the solutions, when prioritized, still revert back to hardscape, barriers, seawalls and armoring. These are nothing more than the same strategies that got us into this situation. "Armoring" in itself is a term meant to deflect harmful aggression and provide protection to the item being armored. It does not protect adjacent property but deflects the energy with increased focus, resulting in increased erosion. Absorption of wave/current energy is how natural systems work. (I doubt the Navy Complex north of Carnation has ever been subject to flooding due to its stable dune community to the west.)

A better proposal would be to encourage (or mandate), setbacks from high tide line and implementation of dune restoration and revegetation for all new construction or development.

Also, by not addressing or including benefits of "managed retreat" you are turning a blind eye to what I know some of you understand is the only long term solution to protecting our community resources. It appears that a small vocal minority has persuaded the powers at be to "kick the problem down the road" to future leadership even when knowing what the inevitable outcome (by this documents own findings) will be.

Are we informing potential buyers of beach front property that within two or three generations the property insurance will be so high that no one can afford it? Do people realize that if they are planning on passing down these properties to future generations that there may be no property to inherit?

I suggest that the City consider acquiring properties within the South Seacoast area as they become available, demolish the structure and replace with a restored dune system along with recreational amenities. Storm surges would pass through the "vacant lots", dissipate energy,

reduce impact to adjacent structures and allow over wash to pass into estuary (a natural phenomena).

How many properties could have been purchased with the money wasted on sand replenishment ? Is it wise to invest in something that will only delay, not eliminate a proven natural threat? Is this really the best way to spend limited regional tax resources? Don't we already know that we will be right back to where we are now in the near future? Isn't this the perfect example of "throwing good money after bad"?

If you are serious about addressing this issue realistically, then don't just talk the talk. I do not support the use of tax payer money to protect private property that belongs to someone who ignores natural processes and wants everyone else to pay for it. I would prefer to walk down the beach that is natural and reflects the community values that you so eloquently list.

(In another matter that does not deal with coastal erosion I would like to suggest that all new development or construction contain features that will collect, store and utilize rainwater for any landscaping proposed. I would also like to see solar panels mandated that would provide 50% of anticipated electric usage).

Thank you for the opportunity to comment



Randal Hawley
284 Ebony Ave
Imperial Beach
ibranger52@gmail.com



COMMENT CARD

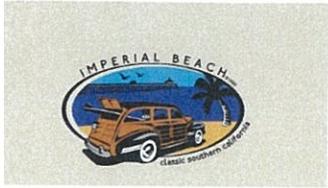
RESILIENT 2019
IMPERIAL BEACH
A LOCAL COASTAL PROGRAM AND
GENERAL PLAN UPDATE

THIS MEETING DID NOT FACILITATE PUBLIC UNDERSTANDING OR GIVE PROPER PUBLIC OUT REACH, THIS USE OF AECOM DOES NOT BUILD TRUST IN OUR CITY COUNCIL, BIG ISSUES NOT ADDRESS,

- SAND REPLENISHMENT —
- BEACH PROTECTION / COASTAL HOMES —
- NON-ISSUES TO US CLIMATE ACTION —
- How does the running by outside interest SANDAG, COASTAL COMMISSION, COASTAL CONSERVANCY AND NGO AFFECT YOUR REPORT
- WHY CAN'T WE ACCESS OUR BAY

VERY DISAPPOINTED

Leon Benham
119-914-9153



Pete Smith
Chair, Design Review Board

COMMENT CARD

RESILIENT 2019
IMPERIAL BEACH
A LOCAL COASTAL PROGRAM AND
GENERAL PLAN UPDATE

Concern with table S-1

How do we know it is accurate?

Why include a worst case scenario in a city plan?

Worst case will discourage future investment

Other changes in the plan are good. Text is good. Checklist makes sense

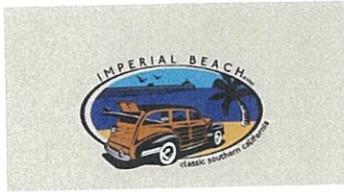


RESILIENT 2019 IMPERIAL BEACH

DATE: APRIL 24, 2019

COMMUNITY WORKSHOP

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Teresa	Lish		
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RESILIENT 2019
IMPERIAL BEACH
A LOCAL COASTAL PROGRAM AND
GENERAL PLAN UPDATE

COMMENT CARD

I am strongly in favor and supportive of expanding and enhancing Bikeway Village and the Bayfront to add business value and income to Imperial Beach. Not only to include restaurants, shops and services along the Bayfront, but to also include water sport rentals such as kayaks and pedal boats. My suggestions regarding restaurants: nice wine bistros; a Classic beach vacation-style place with Tiki-torch ambience and cuisine/craft cocktails similar to Ray's at the Marriott (Marriott Marina San Diego Bay); a gourmet deli with seating; and a nice family-style restaurant. Shops including attire for all ages (beach & sport styles); and a boutique for girls/women such as Blue Jeans & Bikinis (in Coronado). Thankyou.



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."

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.

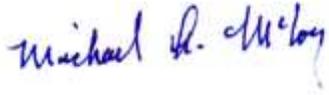
The relationship between general plans and climate change have changed substantially since the City's GP was prepared in 1994 (<https://oag.ca.gov/environment/ceqa/planning>), though the City's current GP/LCP update may qualify for analysis through the ND process. While that approach to updating and 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.

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 Tippetts (billtippetts@gmail.com).

Sincerely,

Handwritten signature of Michael A. McCoy in blue ink.

Michael A. McCoy, President

Handwritten signature of Bill Tippetts in blue ink.

Bill Tippetts, Board Member

Attachments (CAP letter; GP/LCP letter)



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).

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.

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)?

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.

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."

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.

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

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).

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, if not quantified) level of mode shifts are expected.

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 .

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).

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.

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.

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

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).

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.

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.

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.

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).

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.

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.

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.

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).

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

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.

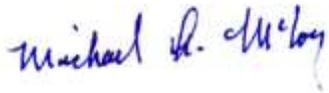
We disagree with the City’s proposed exclusion of managed retreat as an approved shoreline protection/adaptation measure. By doing so, the City’s decision could lead to an increase in coastal erosion and additional impacts to “protect” coastal resources.

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.

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.

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

Sincerely,

Handwritten signature of Michael A. McCoy in blue ink.

Michael A. McCoy, President

Handwritten signature of Bill Tippets in blue ink.

Bill Tippets, Board Member



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

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

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

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.

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.

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.sdforward.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.

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).

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.

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)?

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.

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”).

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).

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

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.

The CAP identifies that 17% of its GHG reductions will derive from increased grid-supplied renewables. It 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.

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.

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/).

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 stated that the target of 80% reduction by 2030 aligns with the company's intentions.

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

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>).

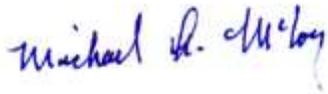
The primary focus for the City's SLR Report was to analyze vulnerability to climate change along Imperial Beach's Pacific shoreline (open coast), though it does assess potential effects further inland. The SLR report identifies adaptation measures that could be implemented through changes in Land Use, 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

From: Pete Laszcz 1456 Oceanfront HOA <1456oceanfront@gmail.com>

Sent: Thursday, May 09, 2019 2:15 PM

To: Steven Dush <sdush@imperialbeachca.gov>

Cc: 1456oceanfront@gmail.com

Subject: LCP

Steve,

Here is my recommended change for the final version of the LCP

Delete the words “**in the foreseeable future**” that appear on page 5-8, 4th paragraph

Thanks

Pete Laszcz

“Based on the findings of the 2016 City of Imperial Beach Sea Level Rise Assessment (IB SLR Assessment), the City can continue to utilize strategies currently in place such as shoreline protection devices and beach nourishment, continued adaptation of public infrastructure, and additional strategies that include but are not limited to living shorelines to adapt to sea level rise throughout the lifetime of the 2019 General Plan/Local Coastal Program Update and beyond. As a result, while managed retreat was included as a potential strategy in the IB SLR Assessment, the City does not consider it a viable or necessary adaptation strategy **in the foreseeable future** 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.”