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

Imperial Beach, California

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TABLE OF CONTENTS

Section **Page**

Abbreviations and Acronyms iii

Negative Declaration. 1

General Plan/ Local Coastal Program (LCP) Update and Climate Action Plan (CAP) for the 2019 Resilient Imperial Beach (RIB) Project. MF 1234 3

General Plan/Local Coastal Program - Land Use Plan Update 5

Land Use Element 6

Mobility Element 6

Conservation and Ecotourism Element 7

Parks, Recreation and Coastal Access Element 7

Facilities and Services Element 8

Safety Element 8

Design Element 8

Local Coastal Program - Implementation Plan Update 10

Development Permit Process 10

Climate Action Plan 12

Baseline Emissions and Reduction Strategies 12

Summary of Imperial Beach CAP Reduction Strategies 14

Summary of Key Project Policies and Implementation Activities 14

Environmental Checklist 17

I. Aesthetics 17

II. Agriculture and Forest Resources 19

III. Air Quality 21

IV. Biological Resources 24

V. Cultural Resources 27

VI. Energy 29

VII. Geology and Soils 30

VIII. Greenhouse Gas Emissions 33

IX. Hazards and Hazardous Materials 38

X. Hydrology and Water Quality 40

XI. Land Use and Planning 44

XII. Mineral Resources 45

XIII. Noise 46

XIV. Population 47

XV. Public Services 48

XVI. Recreation 49

XVII. Transportation 50

XVIII. Tribal Cultural Resources 52

XIX. Utilities and Service Systems 54

XX. Wildfires 56

XXI. Mandatory Findings of Significance 58

References 59

LIST OF FIGURES

Figure **Page**

Figure L-1 General Plan Amendment Land Use Element Land Use Map 4
Figure D-1 Coastal View Corridors Map, Local Coastal Plan Update 9
Figure 1.1 Imperial Beach 2012 GHG Emissions Inventory by Category 13

LIST OF TABLES

Table **Page**

Table 1.1 Emissions Projection, Reduction Targets, and Emissions Reduction Needed 13
Table 1.2 Measures and Quantified Reductions to meet CAP 2030 GHG Emission Reduction Target 14

LIST OF ATTACHMENTS

Attachment

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

Abbreviations and Acronyms

AB	Assembly Bill
ADT	average daily traffic
ARB	California Air Resources Board
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CAP	Climate Action Plan
CBC	California Building Code
CCE	Community Choice Energy
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
CERT	Community Emergency Response Team
City	City of Imperial Beach
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
COPPS	Community Oriented Policing and Problem Solving
CUP	Conditional Use Permit
DTSC	California Department of Toxic Substances Control
EPA	U.S. Environmental Protection Agency
ESHA	Environmentally Sensitive Habitat Area
EV	electric vehicle
GHG	greenhouse gas
GP	General Plan
IP	Implementation Plan
JURMP	Jurisdictional Urban Runoff Management Program
LCP	Local Coastal Program
LUP	Land Use Plan
MRZ	Mineral Resource Zone
MS4	San Diego Regional Municipal Separate Storm Sewer System
MT	metric ton
NAAQS	National Ambient Air Quality Standards
ND	Negative Declaration
NPDES	National Pollution Discharge Elimination System
PHEV	plug-in hybrid EV
PM_{10}	particulate matter less than 10 microns in diameter
PM_{25}	particulate matter less than 25 microns in diameter
PV	photovoltaic
RAQS	Regional Air Quality Strategy
RIB	Resilient Imperial Beach
RPS	Renewable Power Standard
RTIP	Regional Transportation Improvements Program
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Board
SANDAG	San Diego Association of Governments
SB	Senate Bill

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

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Negative Declaration

March 25, 2019

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

General Plan (GP)/Local Coastal Program (LCP) Update and Climate Action Plan (CAP) for the 2019 Resilient Imperial Beach (RIB) Project. MF 1234:
The Imperial Beach General Plan/ Local Coastal Program (LCP) and Climate Action Plan (CAP) Project provides updated policy direction to improve the City's resiliency to sea level rise and climate change while also advancing the City's environmental, economic, and community goals. Further, the City of Imperial Beach's (City) longstanding vision to maintain the City's "small town, quiet, casual atmosphere" while increasing economic stability and improving environmental quality is a major focus of the GP/LCP, and CAP. A city's General Plan guides near-term and long-term growth and development in the community, and because 87% of Imperial Beach is within the Coastal Zone, the General Plan also includes the LCP. An LCP is a plan to guide development in the Coastal Zone. It establishes land use, development, and environmental policies for the area designated as the Coastal Zone by the California Coastal Commission. The LCP consists of two parts: A Land Use Plan (LUP) and an Implementation Plan (IP). The LUP specifies the location, type, and scale of uses of land and water. The IP ensures that the objectives of the LUP are achieved. The CAP establishes a roadmap for the City to meet the 2020 and 2030 greenhouse gas reduction targets and become a more sustainable, adaptable, and resilient community. The project emphasizes long-term collaboration at all levels of government, the private and non-profit sectors, and Imperial Beach residents for successful long-term General Plan/LCP and CAP implementation.

B. ENVIRONMENTAL FINDINGS:

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

(a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

(b) The initial study identifies potentially significant effects, but:

  (1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and

  (2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

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

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

C. MITIGATION MEASURES:

None required.

James Nakagawa, AICP
Imperial Beach City Planner

Attachments:

1. Environmental Initial Study/ CEQA Checklist G
2. Key Proposed General Plan Edits and Coastal Act Consistency Summary
3. Local Coastal Program Implementation Plan Zoning Ordinance

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

California Environmental Quality Act (CEQA)
Environmental Initial Study

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

Submittal Date: March 25, 2019

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

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

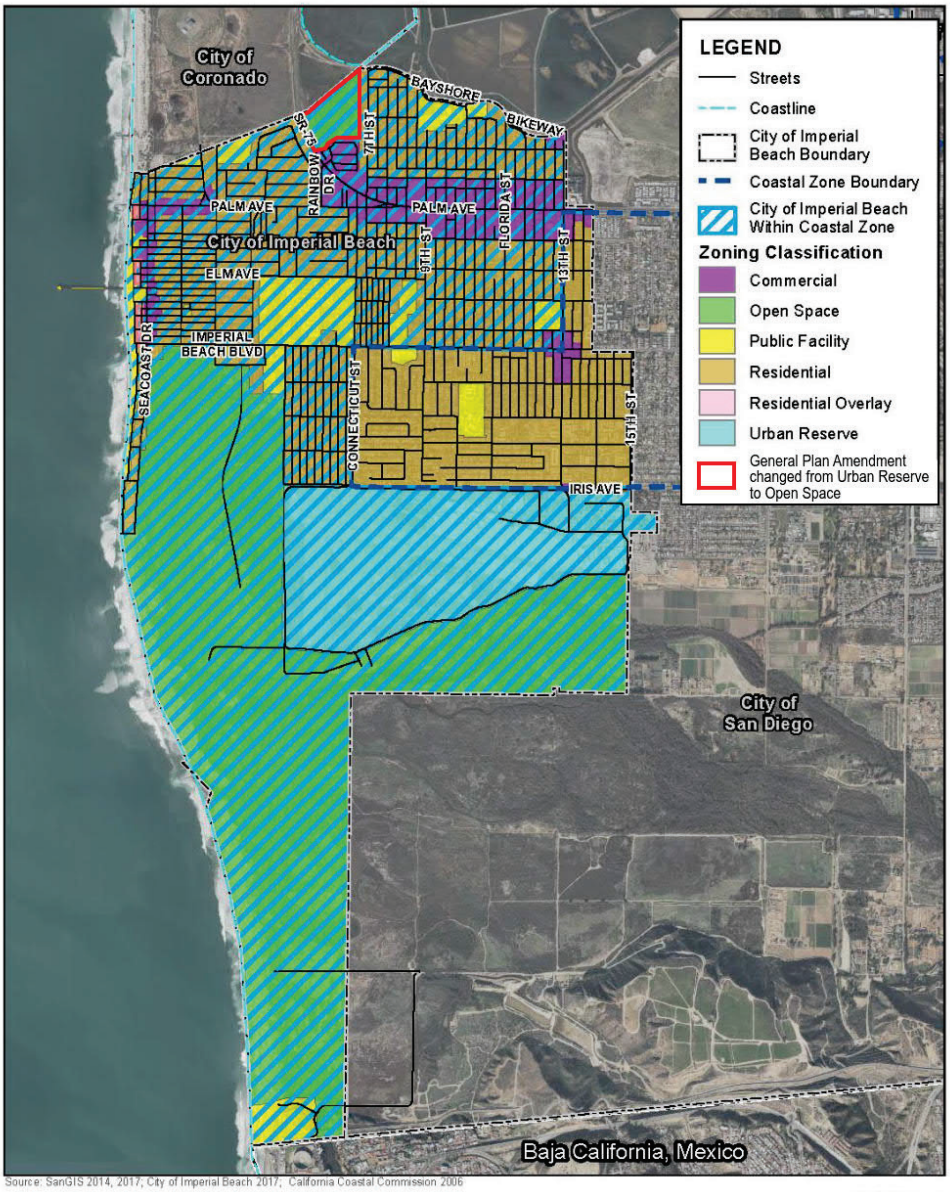


FIGURE L-1
LAND USE MAP

LOCAL COASTAL PLAN UPDATE
IMPERIAL BEACH

The project components and required actions include:

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

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

General Plan/Local Coastal Program – Land Use Plan Update

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

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

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

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

Land Use Element

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

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

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

Mobility Element

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

- Includes goals, policies, and a Street Typology System for "Complete Streets" where the needs of pedestrians, cyclists, and transit users, as well as vehicles are addressed, and vehicle miles traveled and GHG emissions are reduced.
- Advances active living policies that complement the Land Use Element's sustainability and healthy community policies.
- Recognizes and supports the growing role of innovative technology in meeting current and future mobility needs.

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

Conservation and Ecotourism Element

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

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

Parks, Recreation and Coastal Access Element

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

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

Facilities and Services Element

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

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

Safety Element

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

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

Design Element

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

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

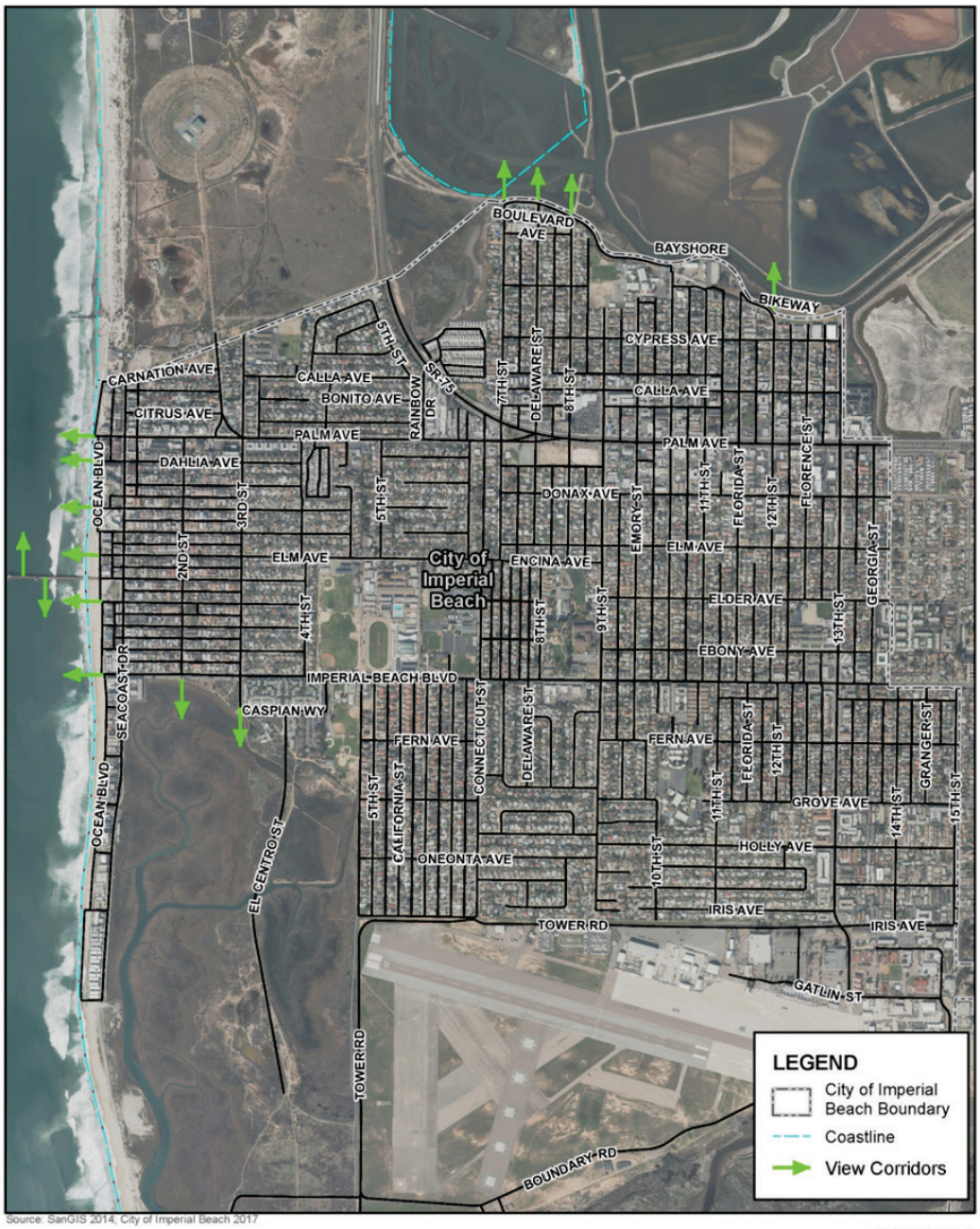


FIGURE D-1
COASTAL VIEW CORRIDORS

LOCAL COASTAL PLAN UPDATE
IMPERIAL BEACH

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

Local Coastal Program – Implementation Plan Update

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

The Zoning Ordinance comprises Title 19 of the Imperial Beach Municipal Code. Title 19 is further organized by numbered chapters, sections, and subsections addressing land development topics. It is available online at https://qcode.us/codes/imperialbeach/.
Proposed amendments to the Zoning Ordinance are summarized below and shown in further detail in Attachment 3.

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

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

Development Permit Process

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

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

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

Climate Action Plan

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

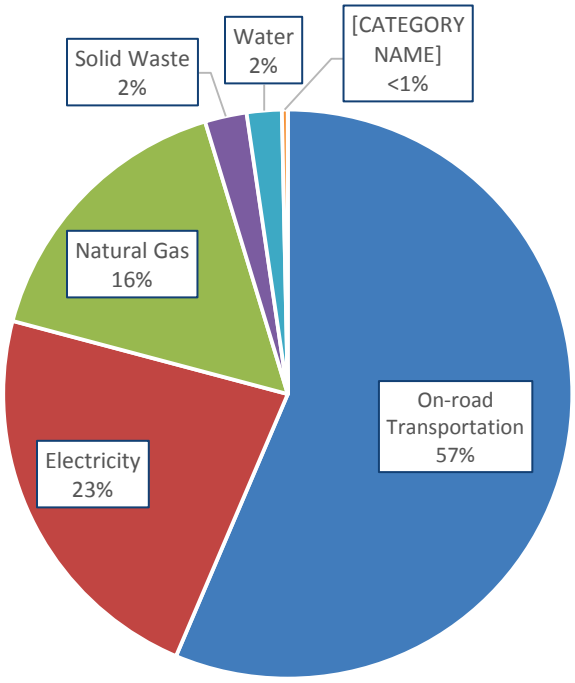
While the core impetus behind a CAP is to reduce GHG emissions responsible for human-induced climate change, it also has an effect on multiple other important factors including the health of the Imperial Beach economy, people, and natural resources. These co-benefits of the CAP include, but are not limited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

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

Baseline Emissions and Reduction Strategies

The CAP provides an overview of the City's GHG emissions profile, 2012 GHG baseline inventory, selected reduction targets, and measures and strategies that have been identified to meet those targets. The 2012 inventory consists of 96,400 metric tons (MT) of carbon dioxide equivalent (CO_2e) with transportation, electricity, and natural gas emissions collectively accounting for approximately 96% of the total (Figure 1.1). The City selected emission reduction targets for 2020 and 2030 of 4% and 42% below 2012, respectively (Table 1.1). These are consistent with state targets using a 2012 inventory baseline to estimate reductions needed to meet 1990 emissions under AB 32 and a 40% reduction below 1990 levels under SB 32. The methodology utilized in the selection process is detailed more fully in Chapter 3 and the technical appendices of the CAP (City of Imperial Beach, 2019a). Emissions reductions that would be needed to meet the long-term goals set in Executive Order S-3-05 are also included; however, the strategies and measures are geared toward achieving reductions through the CAP's 2030 horizon year (Table 1.2). The 2020 target will be met without the need for any local actions. As a result, the measures and strategies are only listed with their estimated contribution toward achieving the 2030 CAP target.

Figure 1.1 Imperial Beach 2012 GHG Emissions Inventory by Category



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

Table 1.1 Emissions Projection, Reduction Targets, and Emissions Reduction Needed

Year	Business-as-Usual Projection (MT CO_2e)	Target Emission Level (% below baseline)	Target Emission Levels (MT CO_2e)	Emissions Reduction Needed to Meet Target (MT CO_2e)
2012	96,400	-	-	-
2020	81,100	-4%	92,700	-11,500
2030	82,200	-42%	55,900	26,300

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

Of the 26,300 MT CO_2e reductions needed to meet the CAP's 2030 target, 6,454 MT CO_2e are estimated to come from local efforts included in the CAP strategies and measures. This amounts to approximately 25% of total reductions, while the other 75%, 19,992 MT CO_2e, are estimated to result from federal and state actions.

Summary of Imperial Beach CAP Reduction Strategies

Table 1.2 Measures and Quantified Reductions to Meet CAP 2030 GHG Emission Reduction Target				
			2030	
Emissions Category	**Reduction Strategies and Measures**		**MT CO2e**	**% of Local Reductions**
On-Road Transportation	Strategy: Clean and Efficient Transportation			
	T.1	Increase Citywide EV Charging Stations	751	11%
	T.2	Clean Municipal Fleet	48	1%
	Strategy: Reduce Vehicle Miles Traveled (VMT)			
	T.3	Increase Mass Transit Ridership	687	10%
	T.4	Improve Pedestrian and Bicycle Facilities	342	5%
	T.5	Reduce Municipal Employee VMT	13	<1%
Energy*	Strategy: Increase Renewable Electricity			
	E.1	Increase Grid-Supply Renewables	1,204	17%
	E.2	Increase Commercial Solar PV	59	1%
Waste	Strategy: Zero Waste			
	W.1	Divert Waste from Landfill	3,318	51%
Carbon Sequestration	Strategy: Carbon Sequestration			
	S.1	Tree Planting	31	<1%
Total GHG Reductions Needed to Reach 2030 Target				**6,454 MT CO_2e**
Total Potential GHG Reductions from Local Measures				**6,454 MT CO_2e**
*** The Energy emissions category consolidates natural gas and electricity categories from Figure 1.1.**				

Summary of Key Project Policies and Implementation Activities

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

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- ☐ Aesthetics
- ☐ Agricultural Resources
- ☐ Air Quality
- ☐ Biological Resources
- ☐ Cultural Resources
- ☐ Energy
- ☐ Geology/Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards & Hazardous Materials
- ☐ Hydrology/ Water Quality
- ☐ Land Use/Planning
- ☐ Mineral Resources
- ☐ Noise
- ☐ Population/ Housing
- ☐ Public Services
- ☐ Recreation
- ☐ Transportation
- ☐ Tribal Cultural Resources
- ☐ Utilities/ Service Systems
- ☐ Wildfire
- ☐ Mandatory Findings

DETERMINATION:

On the basis of this initial evaluation:

☒ I find that the proposed project COULD NOT have a significant impact on the environment, and a **NEGATIVE DECLARATION** will be prepared.

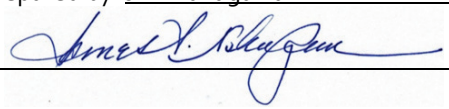
☐ I find that although the proposed project could have a significant impact on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on an earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects 1) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and 2) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Prepared by: Jim Nakagawa



Department Representative: City Planner

Date: March 25, 2019

Environmental Checklist

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
I. AESTHETICS Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Comments:

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

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

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

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

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

The Draft CAP is a policy-level document and does not propose any specific development. However, the Draft CAP encourages the installation of solar PV on new or redeveloped commercial buildings. These installations are anticipated to be consistent with Citywide Design Guidelines and Zoning to transition with the existing urban environment. The Draft CAP also proposes the planting of 850 trees by the year 2030. In accordance with GP/LCP Policy 8.1.2, these trees would be chosen as to not block public views at maturity. Therefore, the impact to visual character would be less than significant.

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

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

Comments:

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

b) As stated above, there are currently no agricultural zoning designations within the City of Imperial Beach. No land within the City of Imperial Beach is subject to the Williamson Act contract. The project would result in no impact to agricultural zoning districts or to land that is subject to a Williamson Act contract.

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

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

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

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
III. AIR QUALITY Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emission (such as those leading to odors affecting a substantial number of people?	☐	☐	☒	☐

Comments:

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

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

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

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

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

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

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

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

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

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

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

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

Comments:

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

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

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

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

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

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

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

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

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

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

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

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

Comments:

a) Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally, a resource is considered to be "historically significant" if it meets one of the following criteria:

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

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

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

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

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

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

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

Comments:

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

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

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

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems, where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Comments:

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

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

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

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

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

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

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

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

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

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

Comments:

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

Similarly, the Draft CAP establishes a roadmap for the City to meet GHG reduction targets and contains recommended strategies and measures for reducing emissions but does not propose or require development of individual land use projects that would otherwise not occur. The measures in the Draft CAP are not anticipated to generate significant impacts since most measures would result in upgrades to existing uses, such as installation of solar PV systems, planting of new trees, and expansion of EV charging infrastructure. Therefore, it is anticipated that any construction-related emissions associated with the policies would be more than offset by the operational benefits of the measures in the Draft CAP. Implementation of the strategies and measures proposed within the Draft CAP would result in annual community-wide GHG emission reductions. It is estimated the Draft CAP local measures would result in total emission reductions of 6,454 MT CO_2e, the amount necessary, when in combination with other state, federal, and regional efforts, to achieve the reduction targets the City has selected for 2020 and 2030. Thus, implementation of the GP/LCP and Draft CAP would be less than significant.

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

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

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

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

T.1 Increase citywide electric vehicle charging stations

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

T.2 Clean municipal fleet

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

T.3 Increase mass transit ridership

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

T.4 Improve pedestrian and bicycle facilities

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

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

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

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

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

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

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

W.1 Divert waste from landfill

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

S.1 Urban tree planting

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

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

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

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

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

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

Although not mandated by AB 32, SB 32, and the Scoping Plan updates, the Draft CAP targets emission reductions below 2012 levels of 4% by 2020 and 42% by 2030, consistent with state guidance in support of state efforts under AB 32 and SB 32. In addition, the Draft CAP also includes projected emission reduction benefits associated with state programs. Without any local actions the City of Imperial Beach would meet and exceed its 2020 reduction target of 4% below 2012 levels. This is because other state, federal, and regional efforts are expected to account for the bulk of reductions. To meet the local 2030 target of 42% below 2012 levels, the Draft CAP would achieve reductions of approximately 6,454 MT of CO_2e. The Draft CAP measures are designed to achieve these reductions, which would be consistent with Scoping Plan recommendations.

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

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

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

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Comments:

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

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

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

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

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

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

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

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

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

Comments:

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

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

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

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

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

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

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

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

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

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

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

ii) The risk of flooding due to surface runoff and coastal flooding is increasing due to sea level rise and climate change. The GP/LCP and CAP are policy-level documents, and do not include any project-specific designs or proposals that could directly result in increased runoff or flooding. However, they do include policies and implementation measures that could indirectly result in future construction and development activity. The GP/LCP proposes measures to prevent flooding, such as raising existing infrastructure and structures, and the adaptation of stormwater and wastewater systems (Policy 7.1.4a). These changes would primarily occur within existing developed areas. As stated above, the GP/LCP and CAP propose measures that could alter existing drainage patterns; however, the projects would largely occur where drainage patterns already exist and would not result in substantial flooding on- or off-site. Additionally, the GP/LCP requires that impervious surfaces are minimized in areas of new development and redevelopment and, where feasible, slow runoff and maximize on-site infiltration of runoff (Policy 8.3.8a). Therefore, future improvements and development consistent with the GP/LCP and CAP would not substantially alter existing drainage patterns or increase the rate of surface runoff in a manner that would result in flooding on- or off-site. The impact would be less than significant.

iii) As stated above, the GP/LCP and CAP propose measures for new development and/or redevelopment that could increase the amount of runoff water; the GP/LCP and CAP also propose measures that are intended to reduce runoff. Although implementation of the GP/LCP and CAP could result in construction-related wastewater discharge into the local sewer system, projects would have to comply with the runoff requirement in the City's JURMP, Municipal Code Chapter 8.30, and the proposed Water Quality Improvement Plans. Future development would be evaluated on a project-specific basis for potential violation of polluted runoff. With the proposed GP/LCP and CAP measures to reduce runoff and the measures currently in place, improvements and development consistent with the LCP/IP/CAP would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. The impact would be less than significant.

d) According to the California Department of Conservation, "a Tsunami is a wave, or series of waves, generated by an earthquake, landslide, volcanic eruption, or even large meteor hitting the ocean." Tsunamis represent a threat to Imperial Beach due to the City's low-lying geography. While the possibility of a major tsunami from a volcanic eruption, landslide, and/or large meteor is extremely unlikely, a tsunami caused by an earthquake is considered possible. Specifically, the Rose Canyon Fault has potential to cause a magnitude 6.9 earthquake, which could trigger a near-shore tsunami along the coastline of the City. Evacuation signs have been posted within areas of the City that could be impacted

by a tsunami. Policies 7.3.1–7.4.10 address safety measures put into place to increase safety against natural disasters. As the GP/LCP and CAP are policy documents and do not propose specific development, future development would be subject to project-level CEQA review to analyze impacts involving risks associated with inundation by seiche, tsunami, or mudflow. However, resiliency measures and monitoring requirements implemented in the GP/LCP and encouraged in the Draft CAP could potentially have a benefit with decreasing the risk to seiche, tsunami, or mudflow. Therefore, the impact would be less than significant.

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

Comments:

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

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

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

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Comments:

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

b) See XII (a), above.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
XIII. NOISE Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

Comments:

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

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

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

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

Comments:

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

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

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☒	☐
iv) Parks?	☐	☐	☒	☐

Comments:

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

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

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

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

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
XVI. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Comments:

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

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

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

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

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

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

Comments:

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

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

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

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

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

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

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

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

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

Comments:

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

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

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

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS Would the project:				
a) Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Comments:

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

b) The city's water supply is provided by the California- American Water Company, or CalAm. Drinking water systems are regulated by the SWRCB, Division of Drinking Water. . The GP/LCP and Draft CAP are policy documents that do not propose any specific development or provide for increased density or intensity of uses. The Draft CAP encourages the planting of 850 trees throughout the City of Imperial Beach. However, the use of water for landscaping would comply with applicable water-efficient landscape standards within the City of Imperial Beach Municipal Code. Additionally, the GP/LCP includes policies to use drought-tolerant plants to the extent feasible in civic landscaping (Policy 4.2.4d). Therefore, no substantial new demand for water supplies would occur. Future development would continue to require a case-by-case review to ensure adequate supplies are available. Therefore, a less than significant impact would occur.

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

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

e) See XIX (d), above.

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

Comments:

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

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

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

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

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Comments:

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

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

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

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ATTACHMENT 2

KEY PROPOSED GENERAL PLAN EDITS AND COASTAL ACT CONSISTENCY SUMMARY

Key Proposed General Plan Edits and Coastal Act Consistency Summary

Overall Notes:

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

Land Use Element

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

Existing – Land Use Element	New Approach – 2.0 Land Use Element	Rationale and Coastal Act Consistency
-	Figure L-2 added to show land and water under San Diego Unified Port District Jurisdiction	Provides information supporting Update collaboration policies.
Policy L-2 Land Use Categories	See policies 2.1.3 and 2.1.4. Content maintained. Policy 2.1.6 Evaluate discretionary project proposals on a case-by-case basis for their impacts on the economy, environment, and social and community character.	Clean-up revisions for clarity and consistency with recent zoning amendments. Case-by-case project review is consistent with Ad Hoc Committee recommendations and helps implement the Coastal Act.
-	Section 2.2 Sustainable Development. Policies include supporting infill that does not have adverse impacts on coastal resources, encouraging adaptive reuse of buildings, and supporting development where there is transit access. New policies supporting resiliency include: Policy 2.2.5 – Adopt sea level rise adaptation approaches that both preserve public access and public and private infrastructure. Policy 2.2.6 – Implement and enforce up-to-date building codes to reduce vulnerability, increase public safety and protect public property from flooding, fire, extreme weather and other risks.	Coastal Act Section 30252. Furthers climate change mitigation and adaptation goals. Reduces vulnerability and builds resiliency to sea level rise and other risks. Supports consistency with the Regional Sustainable Communities Strategy.
Policy L-3 Residential Uses and Neighborhoods	Section 2.3 – Residential Use and Neighborhoods Key message of policies maintained, with new policies to support healthy communities/active living. Policies related to design and transitions now found in Design Element.	Clean-up revisions for clarity and consistency with recent zoning amendments. New policies support state law and local goals.
Policy L-4 Commercial and Mixed-Use Areas	Section 2.4 – Commercial and Mixed-Use Areas Key message of policies maintained, with additional text supporting active living and mixed-use development. Clarifying edits made consistent with recent Zoning Ordinance amendments and applicable design guidelines.	Clean-up revisions for clarity and consistency with recent zoning amendments. Approach affirmed through LCP Update public outreach activities.
-	Section 2.5 – Coastal Priority and Visitor-Serving Commercial Uses. See discussion associated with existing Policy L-6, below	-

Existing – Land Use Element	New Approach – 2.0 Land Use Element	Rationale and Coastal Act Consistency
-	Section 2.6 – Airport Land Use Compatibility and Military Coordination. See discussion associated with existing Policy L-5, below.	-
-	Section 2.7 – Environmental Justice and Healthy Communities New slate of policies addressing environmental justice including: reducing health risk, promoting civic engagement, and prioritizing public facilities to match need.	Implements direction per AB 2616 (2016), state general plan guidance, Coastal Act implementation guidance, and local goals. Reflects input from public meetings regarding enforcing environmental standards. Benefited from UCSD and County of San Diego collaboration
Table L-2 Land Use Designations and Specifications	Table L-2 Land Use Designations. Clarifying edits describing land use designations. Implementing zones identified. Allows additional flexibility for uses to be considered that are deemed compatible with the primary permitted uses.	Section 30250 (a) of the Coastal Act and its general requirements for siting new development in existing developed areas. General Plan is the policy document. The Zoning Ordinance is appropriate location for code specifications. The additional flexibility for uses is to be implemented through a conditional use permit, as described in the proposed Zoning Code amendments (part of the LCP Implementation Plan).
Policy L-5 Ream Field Urban Reserve Area	Section 2.6 – Edits to emphasize City's support for military operations at Ream Field, rather than encouraging closure. New policies to encourage coordination, pursue shared use public facilities, and to maintain compatible noise and safety contours. Maintains the Urban Reserve land use designation.	Ream Field is no longer being considered for closure. City intends to pursue co-benefits from military investments and economic and environmental activities where possible.
Policy L-6 Tourist Commercial Area	Section 2.5 – Edits to support Coastal Act and City's goals for tourism, ecotourism and overall economic development; environmental sustainability; and community character.	Supports implementation of Coastal Act sections 30213, 30221, 30222, 30250, and 30255. Supports integration of ecotourism and economic sustainability goals; supports and updates IB Big Picture goals.
Policy L-7 Revitalization	See Design Element – Section 8.2. See Policy 8.2.7. Edits to recognize state law changes and City actions that have taken place since 1994.	Meets state law and current City conditions; reflects City's financing strategy.

Existing – Land Use Element	New Approach – 2.0 Land Use Element	Rationale and Coastal Act Consistency
Policy L-8 Bayfront/Marina	Land Use Section 2.5 and Design Element Section 8.3. Edits to support Coastal Act and City's goals for tourism, ecotourism and overall economic development; environmental sustainability; and community character.	Edits support the City's recent Zoning Ordinance amendments, and longstanding planning documents including the City's 2005 *Urban Waterfront and Ecotourism Study* and *Imperial Beach – The Big Picture*.
Policy L-9 Lower Cost Visitor and Recreational Facilities	Section 2.5 – Edits to support Coastal Act and City's goals for tourism, ecotourism and overall economic development; environmental sustainability; and community character.	Coastal Act Section 30213, 30221, 30222 and 30250. Edits support the City's recent Zoning Ordinance amendments, and longstanding planning documents including the City's 2005 *Urban Waterfront and Ecotourism Study* and *Imperial Beach – The Big Picture*

Mobility Element

Existing – Circulation Element	New Approach – Mobility Element	Rationale and Coastal Act Consistency
Figure C-1 Regional Transportation Access	Identifies regional access along with other streets on Figure M-2 and discusses the role of the Regional Transportation Plan.	Approach is consistent with an integrated, multi-modal transportation system.
Figure C-2 Street System & Traffic Volumes	Figure M-2 Street Typologies	Approach is consistent with an integrated, multi-modal transportation system.
Table C-1 Intersection Level of Service Definitions	Figure M-1 Sustainable Transportation Hierarchy	A modal hierarchy of users, as shown on Figure M-1, provides a framework to inform planning, design, and operational decisions. The hierarchy is intended to consider and give priority to the most vulnerable users of the roadway and the most resource efficient transportation modes
Table C-2 Intersection Level of Service	Deleted.	In accordance with state law, the City will develop a metric and thresholds of significance for Vehicle Miles Traveled (VMT), or adopt regional standards when available, to replace level of service as the primary determinant of transportation impacts.
Figure C-3 Bus Routes	Updated.	Updated for consistency with the current Regional Transportation Plan

Existing – Circulation Element	New Approach – Mobility Element	Rationale and Coastal Act Consistency
Figure C-4 SANDAG Regional Feeder Bikeways	Replaced with Figure M-5.	Provides a consolidated bikeway plan map.
Goal 1 Balanced Circulation with a-e subparagraphs	Four distinct goals proposed focusing on Complete Streets, small beach town atmosphere, sustainable development, healthy active living, innovative technology and greenhouse gas reduction. Moves away from a vehicle level of service (LOS) goal to a multi-modal network focus.	The Coastal Act Section 30253 calls for a reduction in vehicle miles traveled among other requirements. The Coastal Commission's LCP Update Guide calls for Complete Street requirements to be addressed per AB 1358 (2008). Complete Streets policies are a commitment to providing safe and comfortable mobility options for all users. Adopting Complete Streets policy language also helps position the City to compete for grant funds. In addition, the City anticipates transitioning from a level of service to a Vehicle Miles Traveled (VMT) metric as the primary means to determine transportation impacts, in accordance with Senate Bill 743 (Steinberg, 2013).
Policy C- 1 Street Classification Plan, Design Standards and Dedication Requirements	Section 3.1. New Street Typology System proposed to supplement the City's existing classification system. LOS policies removed.	A new Street Typology system categorizes streets based on character, land uses, functionality, and intended users. It is intended to help guide the selection of design elements that re consistent with roadway environments.
Policy C-2 Street Design and Access	Replaced with multi-modal street design and access policies 3.1.6 – 3.1.24.	Edits are aligned with the City's new Complete Streets approach. Embraces innovative technologies and supports mobility choices to reduce greenhouse gas emissions and vehicle miles traveled. Supports General Plan focus on supporting an active, healthy community and helps position the City for grant opportunities.
Table C-3 Minimum & Maximum Two-Way Traffic Curb Cuts Widths	Curb cuts addressed in Policy 3.1.12 - 3.1.15	Edits are aligned with the City's new Complete Streets approach
Figure C-5 Street Classifications	Figure M-2 Street Classifications	Map updated in GIS

Existing – Circulation Element	New Approach – Mobility Element	Rationale and Coastal Act Consistency
Policy C-3 Ream Field Access	Policy revised to call for collaboration with the City of San Diego.	Removes obsolete guidance.
Policy C-4 Imperial Beach Boulevard Identification	Revised to focus on collaboration.	Removes obsolete guidance.
Policy C-5 Street Improvements	Replaced with policies to require future street improvements to meet City specifications and provide safe and efficient mobility for all users. Added Policy 3.1.11: "As deemed necessary, require developers to dedicate rights-of-way and street improvements associated with their projects."	Removed reference to obsolete Table C-4. Edits are aligned with the City's new Complete Streets approach.
Policy C-6 Traffic Signal Timing	Policy replaced with more comprehensive approach to Intelligent Transportation Systems. See Policy 3.1.23	Modernizes language, updates policies and approach for consistency with the Regional Transportation Plan and Sustainable Communities Strategy.
Table C-4 Improvements Needed to Handle Year 2015 Traffic	Deleted table, which identified improvements as illustrative, and allowed for studies to be conducted at time of need to modify the recommendations. Added Policy 3.1.27 for evaluation of system improvements as project-level implementation opportunities arise.	Modernizes language and is aligned with the City's new Complete Streets approach.
-	Policies 3.1.28 and 29 are new policies regarding ways to prepare for the future and address traffic and parking. The policies are to strive for use of intelligent transportation systems and to evaluate and support autonomous vehicle technology that advances City goals.	Transportation and related technologies are changing rapidly. To prepare for autonomous vehicles, policies that promote flexibility are proposed so the City may maximize benefits and limit unintended consequences.
Policy C-7 Truck Routes	Truck Route Overlay is shown on Figure M-2 and included in discussion section. Street parking restrictions provided in Policy 3.5.6.	Map updated in GIS.
Policy C-8 80 Foot Right-of-Ways	Updated element maintains and supplements City design specification and calls for best practice design. See Policy 3.1.17.	Modernizes language, calls for implementation best practices at the time future projects are evaluated, and is aligned with the City's new Complete Streets approach.

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

Existing – Circulation Element	New Approach – Mobility Element	Rationale and Coastal Act Consistency
Policy C-20 SANDAG Bikeways Plan	Same as C-15	"
Policy C-21 Pedestrian Circulation	Replaced with Section 3.4 – Pedestrian Mobility.	Edits to modernize language, to reflect improvements to the system made since the element was last updated, and to be aligned with the City's new Complete Streets approach.
Policy C-22 Parking	See new Section 3.5 – Parking. Expands policies from supply focus to an approach that addresses parking needs from a supply, management and technologies perspective. References Zoning Ordinance parking requirements. Adds importance of small-town character to parking discussion.	Edits are aligned with the City's new Complete Streets approach and proposed Climate Action Plan recommendations. Character discussion helps implement Ad Hoc Committee's recommendations.
-	Expands discussion and policies regarding coordination with SANDAG and others	Approach is consistent with regional plans and trends.
-	Section 3.6 - Performance Measures Calls for future monitoring	Helps strengthen the understanding of travel behaviors and related responses to future investments.

Conservation & Ecotourism Element

Wetlands and ESHA Approach Overview

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

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

Service) and Border Field State Park (managed by California State Parks). Approximately 928 acres of the TRNERR are located within Imperial Beach city limits.

In 2010, the TRNERR prepared an updated "Comprehensive Management Plan". The key goal of the Comprehensive Management Plan is "to protect, restore and enhance the viability of key coastal habitats and species and preserve the region's cultural heritage while encouraging compatible public use, education and research." In addition, planning is underway for the Tijuana Estuary Tidal Restoration Program- a large multi-phased wetland restoration program involving up to 500 acres of restoration. Its primary objective is to restore valuable habitat processes that have been lost, and to increase the exchange of water in a tidal cycle. This will enhance flushing, improve water quality, and enhance natural processes that deliver sediment from the watershed to the ocean (Revell, 2016). The City recognizes and supports the importance of the TRNERR for its ecological and open space values.

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

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

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

Existing – Conservation and Open Space Element	New Approach – Conservation and Ecotourism Element	Rationale
-	Section 4.1 – Climate Change. Adds discussion and policies on climate change. Climate change covers many General Plan topic areas. Table CE-1 provides a guide to climate planning topics found in five General Plan Elements. Policies are added addressing the overall approach and specific emission categories. Policy 4.1.12 addresses "blue carbon" GHG measures to recognize the role of wetlands in carbon capture.	This section provides the policy framework for greenhouse gas (GHG) reduction measures detailed in the City's draft Climate Action Plan. The integration of climate change policies throughout the plan helps to ensure that climate change will be a core consideration of future planning decisions, programs, and actions. Supports implementation of state climate change legislation, Coastal Act Section 30253, the regional Sustainable Communities Strategy, and local vision and goals.
-	Section 4.2 - Urban Forestry See discussion associated with existing Policy CO-3, below.	-
-	Section 4.3 - Biological Resources See discussion associated with existing Policy CO-5, below.	-
Figure CO-1 Tijuana River National Estuarine Research Reserve	Updated GIS map Figure CE-1	-
Figure CO-2 Estuary Vegetation	Estuary vegetation image will be included in the final draft document.	-
Figure CO-3 Estuary Wildlife	Estuary wildlife image will be included in the final draft document.	-
-	Include a sidebar with the definition of Environmentally Sensitive Habitat Area (ESHA) per Section 30107.5 of the Coastal Act. Sections 30107.5 and 30240 (a) regarding ESHA is also directly incorporated into the General Plan/LCP in the text box at the end of the element.	Coastal Act Section 30107.5 and 30233 (a) regarding ESHA are incorporated into the General Plan/LCP. The definition of ESHA is in the Discussion section as well. In Imperial Beach, sensitive habitat areas around San Diego Bay and the Tijuana River have been preserved and protected through City initiatives and partnerships with state and federal agencies.
Goal 2 Natural Resources - Key Foundation of The City	New goals maintain goal purpose with organization and wording edits.	-

Existing – Conservation and Open Space Element	New Approach – Conservation and Ecotourism Element	Rationale
Goal 3 Resources and Open Space Belong to Everyone	Maintains goal purpose with organization and wording edits.	-
Policy CO-1 The Beach	See Parks, Recreation and Coastal Access Element, Section 5.2. Modernizes language; expands concept to address complete streets and healthy communities.	-
Policy CO-2 Ocean Water Quality	Section 4.4 – Water Quality maintains policy	-
Policy CO-3 Landscaping	Section 4.2 – Urban Forestry maintains and expands policy Policy 4.2.4: "Develop and maintain an active civic landscaping plan for all public landscaped areas under City management to promote the urban forest." The policy also includes sub-policies a-f. Sub-policy d gives preference to species that are drought- and salt-tolerant, native, and noninvasive plants to the extent feasible.	The policy expresses a preference for native and non-invasive plants to support sustainability and conservation.
Policy CO-4 Ream Field	Addressed in the Land Use Element Section 2.6. Maintains Urban Reserve land use designation. Changes emphasis from encouraging Ream Field redevelopment to supporting the Navy's mission and seeking mutual benefits through coordination.	-
Policy CO-5 Estuary	Section 4.3 – Biological Resources This section updates and expands existing policy. Policy 4.3.1 states "Require that new development avoid or minimize impacts to, and provide mitigation for, any adversely impacted special status, threatened, listed, or endangered plant and animal species consistent with all state and federal regulations."	Coastal Act Section 30233 (a) is included in the element and incorporated by reference.
Policy CO-5 Estuary – Buffer	The City's existing buffer policy is proposed to be maintained as Policy 4.3.2. The City recognizes and supports the importance of the Tijuana River Natural Estuarine Research Reserve both for its ecological and open space values. In this regard, the City shall: Assist in the	After careful consideration, the City has determined its existing buffer policy, included as Policy 4.3.2, has successfully protected the Reserve for many years and should be maintained.

Existing – Conservation and Open Space Element	New Approach – Conservation and Ecotourism Element	Rationale
	implementing of the Estuaries Resource protection program, which includes the following development restrictions: "A buffer area will be established for each development adjacent to wetlands. The width of a buffer area will vary depending upon an analysis. The buffer area should be a minimum of 100 feet unless the applicant can demonstrate to the satisfaction of the State Department of Fish and Game and U.S. Fish and Wildlife that 100 feet is unnecessary to protect the resources of the habitat area. If the project involves substantial improvements or increased human impacts, such as a subdivision, a wider buffer area may be required. For a wetland the buffer area should be measured from the landward edge of the wetland."	Buffer widths should be determined on a fact-specific basis. Coastal Act section 30240 does not specifically reference buffers but notes development adjacent to ESHA should be sited and designed to prevent impacts to ESHA. A hard limit should not be set if the Coastal Commission and resource agency staff agree to an alternate approach. City recommends that public improvements such as paved bikeways and other infrastructure and uses benefitting the public should be allowed in buffer areas. Note that the National Estuarine Research Reserve System is a network of 29 coastal sites designated to protect and study estuarine systems. **Established through the Coastal Zone Management Act**, the reserves represent a partnership program between NOAA and the coastal states. NOAA provides funding and national guidance, and each site is managed on a daily basis by a lead state agency or university with input from local partners.
Policy CO-5 Estuary – Management	Policy 4.3.4 – "Support the efforts of habitat preserve managers to adaptively manage the TRNERR to ensure adequate connectivity, habitat range, and diversity of topographic and climatic conditions are provided for species to move as climate shifts."	Adaptive management helps build resiliency to climate change and sea level rise. Emphasizes international significance of Tijuana Estuary.
Policy CO-6 Air Quality	Section 4.5 – Air Quality. Maintains policy with organization and wording edits. References Mobility Element Complete Streets approach.	Policies support climate goals and Complete Streets approach.

Existing – Conservation and Open Space Element	New Approach – Conservation and Ecotourism Element	Rationale
Policy CO-7 Urban Water Run-Off	Section 4.4 – Water Quality. Policy 4.4.7 – "Require implementation of runoff management practices that minimize the volume of urban runoff discharged to receiving waters in areas where minimizing impervious surface is not possible." See also Policy 4.4.12 for BMP examples See Policy 4.7.11 discussed below, for additional support.	Policies support and complement the requirements of the Municipal Separate Storm Sewer System Permit (MS4)
Policy CO-8 Wetlands	See Coastal Act Policies – Conservation, Section 30233 (a), in the callout box at end of the element. Wetlands are addressed in Section 4.3 – Biological Resources.	Coastal Act Section 30233 was incorporated into the element.
Policy CO-9 Water Quality and Watershed Protection	Section 4.4 – Water Quality. Updates and expands policy consistent with Municipal Separate Storm Sewer System Permit (MS4). Adds text related to binational pollution. Also see references under Policy CO-7, above.	Policies support and complement the requirements of the MS4 permit. Public comment received during the GP/LCP update process highlighted the importance of addressing binational pollution from environmental quality and environmental justice perspectives.
-	4.6 – Cultural Resource Tribal Cultural Resources. Adds new goals and policies.	Addresses SB 18 and AB 52 requirements.
-	4.7 – Ecotourism. Adds new goals and policies, including: Policy 4.7.2 New visitor-serving uses should not displace existing low-cost visitor–serving uses unless an equivalent low-cost replacement is provided where feasible. Policy 4.7.11 "Continue collaboration with agencies such as the Unified Port of San Diego, the U.S. Fish and Wildlife Service, and the TRNERR to enhance the beach, San Diego Bay shoreline, Tijuana River Estuary, and trail networks." Also includes sub-policies a-f.	Modernizes language, updates policies and approach consistent with General Plan Update theme of working toward environmental, economic and community goals. Edits support the City's recent Zoning Ordinance amendments, and key concepts from longstanding planning documents including the City's 2005 *Urban Waterfront and Ecotourism Study* and *Imperial Beach – The Big Picture*.

Existing – Conservation and Open Space Element	New Approach – Conservation and Ecotourism Element	Rationale
	Sub-policy b. is to "Support wetland restoration of Pond 20." Sub policy e. is to "Support research, cultivation, and farming (aquaculture) of coastal resources, and other eco-tourism endeavors, in a manner that is sustainable and designed to minimize impacts on coastal resources to the maximum extent feasible." Policy 4.7.12 Implement a signage and wayfinding program to attract Bayshore Bikeway cyclists to visit the Bikeway Village and Seacoast Commercial District consistent with the signage policies of the LCP.	

Parks, Recreation & Coastal Access Element

Existing – Parks, Recreation and Access Element	New Approach – Parks, Recreation and Coastal Access Element	Rationale and Coastal Act Consistency
Table P-1 Park and Recreation Facilities	Updated to reflect existing conditions.	-
Figure P-1 Park and recreation Facilities	Updated to reflect existing conditions.	-
Figure P-2 Walking Distance	Figure P-2 updated.	-
Discussion p. P-7	References to (former) National Recreation and Park Association standards in discussion text deleted.	Standards are outdated.
Goal 13 The City Shall Provide Adequate Parks and Recreation Amenities for A Healthy Environment and Quality of Life with a-e subparagraphs	Maintains goal content with some wording edits.	-
Policy P-1 Opportunities for All Ages, Incomes, and Life Styles	Maintains policy intent with organization and wording edits. Added new policies on striving for equity in the provision of parks. See policies 5.1.1, 5.1.3, 5.1.12, and 5.1.13	Helps implement local goals and state General Plan and Coastal Act implementation guidance for environmental justice.

Existing – Parks, Recreation and Access Element	New Approach – Parks, Recreation and Coastal Access Element	Rationale and Coastal Act Consistency
Policy P-2 Ocean and Beach Are the Principal Resources	Section 5.2 – Public Coastal Access Continues to recognize the importance of the ocean and beaches as recreational assets. See policies 5.1.4,5.2.1- 5.2.5	Meets local goals and Coastal Act guidance. The beach, bay and estuary are key recreational amenities for residents and visitors.
Policy P-3 Joint School/Park Sites	Continues and expands policies supporting joint use. See policies 5.1.5 – 5.1.6;5.1.9; 5.2.6 – 5.2.7	Emphasizes importance of joint use and coordination with other government agencies
Policy P-4 Private Sector Open Space, Parks and Recreation	Maintained as Policy 5.1.7	-
Policy P-5 Recreation Programs	Policy edited but core content maintained. See policies 5.1.1,5.1.2, 5.1.4, 5.1.8,5.2.1- 5.2.5	-
Policy P-6 Design of Visitor and Recreational Facilities	Policy edited but core content maintained. Same references as Policy P-5	-
Policy P-7 Increase Tourist Related Commercial Land Uses	Policy edited but core content maintained. See Land Use Element Section 2.5 – Coastal Priority and Visitor-Serving Commercial Uses.	-
Policy P-8 Bayfront Park	Policy edited but core content maintained and expanded. Policy 5.2.10 addresses enhancing public coastal access in the City through the creation of a linear park or other activating uses along the City Bayfront.	Complementary policies are in Land Use Element Section 2.5 and the Design Element Policy 8.3.2. Future potential project impacts will be evaluated on a case-by-case basis, per Land Use Element Policy 2.1.7
Figure P-3 Bayfront Park	Imagery to be added to final draft.	-
Policy P-9 New Park Land	Policy for the City to pursue expansion of new park land maintained. Policies added to also pursue other park system improvements. See Policies 5.1.11 - 5.1.14.	Recognizes importance of park land as well as improved recreational facilities in serving the community.

Existing – Parks, Recreation and Access Element	New Approach – Parks, Recreation and Coastal Access Element	Rationale and Coastal Act Consistency
Table P-2 Vertical and Lateral Coastal Access	Table has been updated to reflect existing conditions. New policy language on maintaining coastal access and increasing resiliency to sea level rise (see also Safety Element). California Coastal Trail language added.	Addresses Coastal Act sections: 30210; 30211; 30214 Edits are consistent with Coastal Act implementation guidance. Public workshops provided an opportunity for the public to provide input on access points.
Figure P-4 Vertical and Lateral Coastal Access	Figure P-3 – updated in GIS	-
Goal 14 Shoreline Access	Section 5.2 – Public Coastal Access added to cover Coastal Act requirements for lateral and vertical access, and to address sea level rise. Policies include: 5.2.1 Maintain free public beach access. 5.2.2 Maintain a comprehensive network of improved beach access facilities at all designated primary beach access points to ensure safe access to all public beaches and continue to improve, maintain, enhance and maximize public use of the beach access points and beach facilities. 5.2.3 Provide physical access to the City's coastal resource areas for all segments of the population, consistent with public safety needs and without overburdening the City's public improvements or causing substantial adverse impacts to adjacent private property owners.	Addresses Coastal Act sections: 30210; 30211; 30214 Policies added to address public access broadly, including alternative modes of transportation to support public access and reduction of GHG emissions.
	Policy 5.2.9 addresses public parking and access via public transportation.	Specifications for the precise location, number of, and time-limits related to parking spaces are not included. These factors change over time and should not be in the General Plan/LUP. The City needs to be able to impose reasonable time restrictions on street ends for public safety purposes.

Existing – Parks, Recreation and Access Element	New Approach – Parks, Recreation and Coastal Access Element	Rationale and Coastal Act Consistency
Policy P-10 Amend San Diego Unified Port District Master Plan	Edits to continue working collaboratively with the San Diego Unified Port District (SDUPD). Policy 5.2.10 addresses public coastal access through street ends.	The SDUPD owns and leases land in Imperial Beach. Continued collaboration is mutually beneficial. SDUPD is currently updating the Port Master Plan.
Policy P-11 Coordinate with State and Federal Agencies	Element policies continue to call for coordination with state and federal agencies, as well as other agencies, the private sector, and others.	Continued collaboration is mutually beneficial
Policy P-12 Maintain Environmental Quality	Maintained as Policy 5.2.8	-
Policy P-13 Improving Access-ways	Policy edited but core content maintained. See Policy 5.2.9.	-
Policy P-14 Retain Existing Street Ends	Policy edited but core content maintained. See Policy 5.2.10.	-
Policy P-15 Ocean Lane and Alleys West of Seacoast Drive	Policy edited but core content maintained. See Policy 5.2.11.	-
Policy P-16 Prescriptive Rights	Maintained. See Policy 5.2.12.	-

Facilities and Services Element

Existing – Facilities and Services Element	New Approach – Facilities and Services Element	Rationale and Coastal Act Consistency
Goal 5 - Facilities and Services Concurrent with Need	Goal maintained with minor wording edits	-
Figure F-1 Public Facilities	Figures to be determined in final draft.	-
Policy F-1 Development Impact	Section 6.1 – Capital Improvement Planning and Financing Policy maintained. See Policy 6.1.1	-
Policy F-2 Capital Improvement Planning	Policy edited but core content maintained. See Policy 6.1.2	-
Policy F-3 Public Facility Locations	Policy edited but core content maintained. See Policy 6.1.2 New Policy 6.1.3 to consider sea level rise in the design and location of public facilities.	Supports resiliency goals.

Existing – Facilities and Services Element	New Approach – Facilities and Services Element	Rationale and Coastal Act Consistency
Policy F-4 Relocate City Yard	Policy expanded to address private/public partnerships and evaluation for highest and best community use. See Policy 6.1.4.	-
-	Policy 6.1.5 covers green infrastructure.	Supports use of a combination of green (nature-based) and grey (engineered projects) as appropriate. Supports climate mitigation and resilience.
Policy F-5 Retain Existing Civic Center Complex	Section 6.1 Capital Improvement Planning and Financing. Covered in Discussion text	-
Policy F-6 Fire Rating	Section 6.2 Fire and Emergency Services Edits to update baseline facilities information.	Provides up-to-date information.
Policy F-7 Public Information and Involvement	Section 6.3 – Law Enforcement Policy edited but core content maintained. See policies 6.3.1 – 6.3.2.	Provides up-to-date information.
Policy F-8 Crime Rates	Section 6.3 Law Enforcement. Edits to update baseline facilities information. See Policy 6.3.3.	Provides up-to-date information.
Policy F-9 Library Size	This section has been updated. The new Imperial Beach Library is described in the discussion section of Section 6.1.	Provides up-to-date information.
Policy F-10 Alleys	Section 6.4 – Public Rights-of-Way. This section has been updated, including discussing risks due to sea level rise and climate change.	Provides up-to-date information.
Policy F-11 Drainage	This section has been updated and is found in the Design Element. See Policy 8.2.7.	Provides up-to-date information.
Policy F-12 Sidewalks/Tree lawns	This section has been updated. Sidewalks are covered in Section 6.4. Supportive policies are also found in the Conservation Element Section 4.2 - Urban Forestry, and the Design Element Section 8.2 – Public Realm and Public Facilities.	-
Policy F-13 New Sidewalks	This section has been updated. Sidewalks are covered in Section 6.4.	-
Policy F-14 Street Trees	Same as references for Policy F-12 above.	-

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

Safety Element

Existing – Safety Element	New Approach – Safety Element	Rationale and Coastal Act Consistency
Figure S-1 100 Year Flood Plain	Figure S-1A 100-Year Flood Plain updated in GIS Figure S-1B 100-Year Flood Plain – Port District	Provides up-to-date information
Figure S-2 Geology	Figure S-2 Geology updated in GIS	Provides up-to-date information.
Figure S-3 Soils	Figure S-3 Soils updated in GIS	Provides up-to-date information.
Goal 15 Safety Protection	Expanded goal to cover reducing risks from climate change.	Coastal Act Section 30253 Meets objective of LCP update to improve resiliency.
Goal 16 Shoreline Protection	Maintained policy with wording edits.	Coastal Act Section 30235
-	New goal for increased disaster preparedness and resiliency through regional collaboration.	Meets objective of LCP update to improve resiliency.
-	New discussion text on sea level rise assessment and adaptation strategies under consideration. Managed retreat is not included in the draft General Plan and is not being pursued.	Meets objective of LCP update to improve SLR resiliency. Considers Coastal Commission Sea Level Rise Policy Guidance and LCP Update Guide on coastal hazards.
-	Section 7.1 – Sea Level Monitoring, Planning, and Adaptation Calls for a data-driven monitoring approach, including gathering data from residents' experiences. Includes a subsection on the need for coordination and collaboration with other agencies.	Recommends sea level rise adaptation strategies. Collaboration and coordination are necessary for systems-level solutions to complex problems. Tailored adaptive management approach. Addresses environment, economic and community values.
-	Section 7.2 – Shoreline Protection/Coastal Hazards & Sea Level Rise Response Existing protective devices to be maintained.	Meets objective of LCP update to improve resiliency. Integrates components of Coastal Commission Sea Level Rise Policy Guidance and LCP Update Guide on coastal hazards.
Policy S-1 Technical Studies	Section 7.3 Geological and Seismic Hazards	-

Existing – Safety Element	New Approach – Safety Element	Rationale and Coastal Act Consistency
Policy S-2 Leave Hazardous Areas Underdeveloped	Section 7.1 – Sea Level Rise Monitoring, Planning, and Adaptation, see section on *Development Design and Siting*; and Section 7.4 Disaster Preparedness. Policy replaced with a suite of policies addressing the issue comprehensively	Tailored adaptive management approach. Addresses environmental, economic and social values.
Policy S-3 Floodplains in Open Space	Policy deleted in Safety Element. Issue is addressed in the Land Use Element with a proposal to re-designate Salt Pond 10a from Urban Reserve to Open Space.	Land Use Element is where the General Plan addresses land use designations.
Policy S-4 High Risk Areas	Policy 7.1.26 – policy expanded to cover resiliency.	Collaborate with SANDAG and other agencies/institutions to use best available data for beach width/sand volume monitoring
-	7.2 Fire Hazards section added. Includes new policies for fire prevention and safety.	State law requires cities to update their general plan safety elements to address the risk of fire.
Policy S-5 Construction Near Fault Traces	Section 7.3 Geological and Seismic Hazards See Policy 7.3.1- minor wording edits to policy.	-
Policy S-6 Cliff Top Development	Policy deleted, replaced with Section 7.1 – Sea Level Rise Monitoring, Planning, and Adaptation, (see *Development Design and Siting* policies)	Addresses hazards and resiliency more comprehensively.
Policy S-7 Flood Control Program	Section 7.1 – Sea Level Rise Monitoring, Planning, and Adaptation, see *Flooding* policies.	Helps meet LCP goal of increasing resiliency.
Policy S-8 Disaster Preparedness	Section 7.4 Disaster Preparedness Policy updated and expanded to align with the San Diego County Multi-Jurisdictional Local Hazard Mitigation Plan.	Helps meet LCP goal of increasing resiliency. Aligned with Federal Emergency Management Agency – mandated hazard mitigation planning.
Policy S-9 Public Education	Policy edited but core content maintained. See 7.4.8.	-
Policy S-10 Regulate Shoreline Land Use and Development	Section 7.1 – Sea Level Rise Monitoring, Planning, and Adaptation. Contains a suite of policies which update and expand upon this topic.	Collaborate with SANDAG and other agencies/institutions to use best available data for beach width/sand volume monitoring.

Existing – Safety Element	New Approach – Safety Element	Rationale and Coastal Act Consistency
S-11 Storm Waves, Flooding and Seacliff Erosion	Section 7.1 – Sea Level Rise Monitoring, Planning, and Adaptation, see *Shoreline Protection Devices* policies. Ordinance language is preserved, with edits for clarity, and expansion of vertical seawall requirements if necessary for protection to the broader shoreline rather than just north of Imperial Beach Blvd. See Policy 7.1.8 regarding beach width.	Seek to maintain walkable beach except for temporary loss during storms/extreme high tides. Evaluate adaptation strategies based on economic, environmental, and social impacts.

Design Element

Existing – Design Element	New Approach – Design Element	Rationale and Coastal Act Consistency
-	Figure D-1 added to show public coastal view corridors	Coastal Act Section 30251 requires that development be sited and designed to protect views to and along the ocean and other scenic coastal areas.
Figure D-1 Functional Areas	Figure D-2 Functional Areas	-
Goal 4 Visual Quality Is Important	Maintains goal content with some wording edits. Added goals for: preservation of small beach-town character, preservation of public views, and a City designed for walkability, sustainability, and resiliency.	Coastal Act Sections: 30251;30253 Support implementation of new state laws and General Plan Update theme of working toward environmental, economic and community goals.
Policy D-1 Design Review	Policy slightly edited but core content maintained. See Policy 8.1.8	-
Policy D-2 Design Guidelines	Policy slightly edited but core content maintained. See Policy 8.1.7	-
-	Section 8.2 – Public Realm and Public Facilities Added policies focusing on civic architecture and public spaces, the "Tree-Covered City Image," revitalization, and signs.	Emphasizes importance of the public realm.
Policy D-3 Sign Program	Policy maintained, and subsections added to provide more details. See Policy 8.2.12	-

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

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

ATTACHMENT 3

LOCAL COASTAL PROGRAM IMPLEMENTATION PLAN ZONING ORDINANCE REVISIONS

IMPERIAL BEACH ZONING ORDINANCE [1]

MUNICIPAL CODE TITLE 18

CHAPTER 18.16 MAJOR SUBDIVISIONS- DESIGN AND IMPROVEMENT REQUIREMENTS

18.16.160. Office, commercial, and industrial zones.

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

A. …[2]

MUNICIPAL CODE TITLE 19

CHAPTER 19.04 DEFINITIONS

19.04.021. Addition of Permitted Use.

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

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

19.12.020. Permitted Uses

A. ….

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

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

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

[2] Bullets shown with "…" indicate additional unchanged text not shown.

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

9. Addition of Permitted Use (see definition)

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

19.13.020. Permitted Uses

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

A. One single-family detached dwelling per lot;

B. …..

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

A. Churches;

B. Day care center;

C. Library;

D. Mobile home parks;

E. Parks;

F. Senior housing as permitted in Chapter 19.67;

G. Schools;

H. Wireless communications facilities, when necessity compels placement to avoid a significant gap in wireless communications coverage. (Ord. 2002-983 § 10, 2002; Ord. 94-884)

I. Addition of a Permitted Use (see definition)

19.13.030. Yards

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

A. Front Yard. There shall be a minimum front yard of fifteen feet, provided that the front of a garage shall be set back a minimum of twenty feet.

B. Side Yard. There shall be a minimum side yard of five feet ~~if on an alley and ten feet if no alley~~.

C. Rear Yard. There shall be a minimum rear yard five feet if on an alley and of ten feet if no alley.

D. Street Side Yard. There shall be a minimum street side yard of ten feet. (Ord. 94-884; Ord. 601 § 1, 1983)

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

19.14.020. Permitted Uses

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

1. Single-family detached dwellings;

2. ~~…..~~….

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

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

CHAPTER 19.15 R-3000 TWO-FAMILY RESIDENTIAL ZONE
19.15.020. Permitted Uses

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

1. Detached or attached residential dwelling units;
2 …….

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

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

CHAPTER 19.16 R-2000 MEDIUM DENSITY RESIDENTIAL ZONE
19.16.020. Permitted Uses

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

development department and five or more units shall be subject to the approval of a site plan review by the planning commission:

1. Detached or attached residential dwelling units;

2. …….

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

1. Churches;

2. Day care centers;

3. Library;

4. Mobile home parks;

5. Parks;

6. Senior housing as permitted in Chapter 19.67;

7. Schools;

8. Wireless communications facilities, when necessity compels placement to avoid a significant gap in wireless communications coverage. (Ord. 2002-983 §§ 15, 16, 2002; Ord. 97-917 § 2, 1997; Ord. 94-884)

9. Addition of a Permitted Use (see definition)

CHAPTER 19.17 R-1500 HIGH DENSITY RESIDENTIAL ZONE
19.17.020. Permitted Uses

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

1. Detached or attached residential dwelling units;

2. ….

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

1. Churches;

2. Day care centers;

3. Library;

4. Mobile home parks;

5. Parks;

6. Senior housing as permitted in Chapter 19.67;

7. Schools;

8. Wireless communications facilities, when necessity compels placement to avoid a significant gap in wireless communications coverage.

9. Addition of a Permitted Use (see definition)

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

1. ….

CHAPTER 19.23. COMMERICIAL/MIXED-USE USE REGULATION

19.23.010. Land use table.

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

Key to Land Use Tables

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

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

H-1 A site area of a minimum of thirty-five thousand square feet; at least thirty guest rooms; facilities for conference, meeting, or public use; and a full-service restaurant on-site.

H-2 A "motel," which is an establishment providing guest rooms, for periods less than thirty days, with most rooms gaining access from an exterior walkway.

H-3 A lot, parcel, or segment of real property dedicated to "timeshare units," as defined in Section 19.04.756 of the Imperial Beach Municipal Code.

H-4 A "bed and breakfast" lodging place containing no more than six guest rooms and one kitchen.

H-5 An "inn" means a commercial establishment that affords public lodging to travelers, for periods less than thirty days. A kitchen and dining area may also be included to provide meal and beverage service to guests and to the general public.

	C/MU-1	C/MU-2	C/MU-3	Notes
Commercial Uses				
Adult bookstore, adult hotel/motel, adult mini-motion picture theater, adult motion picture arcade, adult motion picture theater, sexual encounter studio, rap parlor, model studio	P	N	N	See definitions. Subject to requirements for adult-oriented businesses in Chapter 19.60.
Antique store	P	P	P	See definition.
Arcades and game centers	C	C	C	See definition.

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

	C/MU-1	C/MU-2	C/MU-3	Notes
Palm reading establishment	C	N	N	See definition. Subject to Section 19.26.020(B)(3).
Pawnshop	C	N	C	See definition.
Personal convenience services	P	P	P	See definition.
Pool or billiard hall	C	C	N	See definition.
with live entertainment	C	C	N	See definition.
Postal services, private	P	P	P	
Professional offices, financial institutions, and real estate	P	P	P	
Restaurant	P	P	P	See definition.
with live entertainment	C	C	C	See definition.
Retail food store	P	P	P	
Retail sales	P	P	P	See definition.
Sales of secondhand or used merchandise	N	N	N	See definition and Section 19.74.100.
~~Single-family detached~~	~~N~~	~~N*~~	~~N~~	~~*Only permitted in Seacoast Mixed-Use/Residential Overlay Zone.~~
Tattoo establishment	C	N	N	See definition. Subject to Section 19.26.020(B)(4).
Residential and Similar Uses				
Accessory building, structures, private garages	C	C	C	See definition of accessory building.
Boarding house	C	N	N	See definition.
Emergency shelter	P	N	N	See definition.
Hostel	N	C	N	See definition.
Hotel, motel, bed and breakfast lodging, inn (H-1, H-2, H-3, H4, H-5)	P	P	P	See definitions above.
Live/work unit	P	P	P	See definition.
Mixed-use development	P	P	P	See definition.
Motor home/manufactured housing community	N	N	N	See definitions.

	C/MU-1	C/MU-2	C/MU-3	Notes
Multiple-family dwellings	P	P	P	See definition. See requirement for active commercial uses on ground floor per Sections 19.26.020(A)(1), 19.27.020(A)(1), 19.28.020(A)(1).
Second-family units	N	N	N	
Senior housing, nursing home, retirement home	C	C	C	See definitions.
Short-term rental	P	P	P	See definition.
Single-family detached	N	N*	N	*Only permitted in Seacoast Residential Overlay Zone.
Single-room occupancy units	C	N	N	
Timeshare	C	C	N	See definition.
Light Industrial Uses				
Automobile dismantling or wrecking yard	N	N	N	See definition.
Automobile repair or automobile body shop	C	N	N	See definitions.
Automobile sales lot	C	N	N	See definition.
Automobile service station/gas station	C	N	C	See definition.
Energy facility	C	N	N	See definition.
Equipment rental yard	C	N	N	
Incidental manufacturing	C	C	C	See definition.
Light manufacturing, manufacturing, industrial	N	N	N	
Public and Semi-Public Uses				
Campsites	N	N	N	See definition.
Clubs, fraternal/veteran/service organizations	C	C	C	Subject to Sections 19.26.020(B)(2), 19.27.020(A)(3), 19.28.020(A)(2).
with live entertainment	C	C	C	
Educational institutions	C	C	N	
Governmental or quasi-public building	P	P	P	
Library	P	P	P	

	C/MU-1	C/MU-2	C/MU-3	Notes
Religious assembly	C	C	C	See definition. Subject to Sections 19.26.020(B)(2), 19.27.020(A)(3), 19.28.020(A)(2).
Public parking lot	P	P	P	
Theatre/assembly	C	C	C	
Wireless communication facility	C	C	C	See definition. Subject to Chapter 19.90.
Green Building Utilities				
Green building utilities	P	P	P	See definition. Subject to Chapter 19.92.
Open Space and Recreation				
Passive public parks	P	P	P	
Playground and recreation areas	C	C	C	Permitted if incidental and accessory to a permitted use.
Public riding and hiking trails	P	P	P	

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

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

19.25.010. Purpose of zone.

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

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

19.26.020. Permitted Uses

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

1. For all buildings with frontage along Palm Avenue, including those with multiple-family dwelling units, "active commercial uses" as defined in Chapter 19.~~05~~ 04 are required to be provided at a minimum of sixty percent of each building's ground floor lineal footage, have direct pedestrian access from the Palm Avenue sidewalk or a plaza, and have a minimum building depth of twenty-five feet. The remaining forty percent must either be primarily related to the commercial use, such as parking, access, or other non-active commercial purpose or, if related

to non-commercial use, must be designed either to encourage and promote pedestrian activity or to visually screen required on-site parking.

2. …….

CHAPTER 19.27 C/MU-2 SEACOAST COMMERCIAL AND MIXED-USE ZONE
19.27.020. Permitted Uses

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

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

2…

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

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

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

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

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

d. Two or more of the following:

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

ii~~c~~. The e~~E~~ntire project provides a minimum of seventy-five percent "active commercial uses" on the ground floor;

~~d. At least twenty-five percent of proposed residential units must be three-bedroom units;~~

iii~~e~~. Provision~~de an additional one hundred square feet~~ of common open space or plaza space equal to three percent of the total lot area using one of the following methods: ~~with minimum dimensions of six feet by ten feet;~~

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

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

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

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

1. All proposed developments involving new construction;

2. Any addition, construction, remodeling or alteration of existing buildings resulting in an increase of ten percent or greater of the gross floor area of a commercial structure or in an individual commercial space within the structure or within a commercial shopping center;

3. Any proposed commercial use, residential use, or structure requiring the approval of a conditional use permit;

4. Any development including residential dwelling units; and

5. Public parking lots.

C. …

19.27.70. Building Height

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

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

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

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

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

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

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

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

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

A. …..

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

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

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

19.27.150. Specific plan.

A. The City Council may approve a specific plan for an H-1 hotel as defined in Chapter 19.~~25~~04 of this code that allows deviations from the following regulations in the C/MU-2 zone:

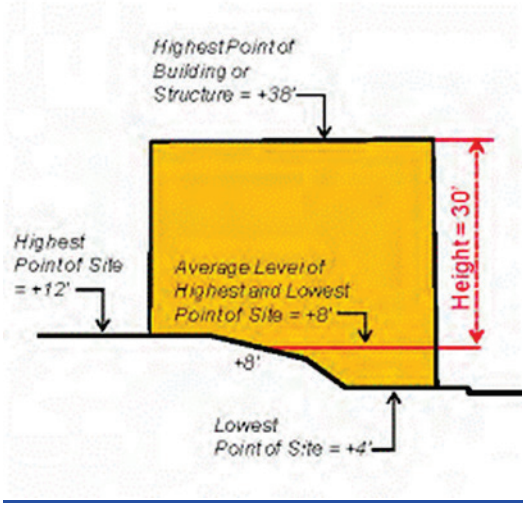
….

CHAPTER 19.40 BUILDING HEIGHT

19.40.030. Measurement of height.

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

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



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

CHAPTER 19.44 CURB CUTS

19.44.020. Access.

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

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

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

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

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

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

19.44.030. Separation.

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

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

CHAPTER 19.48 OFF-STREET PARKING

19.48.020. Requirements generally- Existing buildings and additions.

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

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

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

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

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

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

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

A. …

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

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

CHAPTER 19.50 OPEN SPACE AND LANDSCAPING

19.50.030. Commercial landscaping.

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

B ….

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

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

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

19.50.050. Residential landscaping.

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

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

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

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

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

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

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

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

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

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

CHAPTER 19.81 SITE PLAN REVIEW

19.81.070. Plans and information requirements.

A. Plot Plan. The plot plan shall indicate:

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

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

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

Chapter 19.84 VARIANCES
19.84.150. Administrative adjustments

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