

CITY OF IMPERIAL BEACH

HOUSING ELEMENT OF THE GENERAL PLAN

YEAR 2021-2029



INITIAL STUDY/NEGATIVE DECLARATION

April 2021

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I. INTRODUCTION

A. INTRODUCTION AND REGULATORY GUIDANCE

An initial study is conducted by a lead agency to determine if a project may have a significant effect on the environment (CEQA Guidelines Section 15063[a]). If there is substantial evidence that a project may have a significant effect on the environment, an environmental impact report (EIR) must be prepared, in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15064(a). However, if the lead agency determines the impacts are, or can be reduced to, less than significant, a Mitigated Negative Declaration (MND) or Negative Declaration (ND) may be prepared instead of an EIR (CEQA Guidelines Section 15070[b]). Pursuant to CEQA Guidelines Section 15070, a MND or ND is appropriate when the project's initial study identifies potentially significant effects, but:

- a. Revisions to the project plan were made that would avoid or reduce the effects to a point where clearly no significant effects would occur; and
- b. There is no substantial evidence that the project, as revised, may have a significant effect on the environment.

An Initial Study (IS) conducted by the City of Imperial Beach (including an attached Environmental Checklist form) determined that the proposed project will not have a significant environmental effect, and the preparation of an EIR will not be required. This IS/ND has been prepared in accordance with Section 15070 of the State California Environmental Quality Act (CEQA) Guidelines.

B. LEAD AGENCY

The lead agency is the public agency with primary responsibility over a proposed project. In accordance with CEQA Guidelines Section 15051(b)(1), "the lead agency will normally be the agency with general governmental powers." The project would be approved and carried out by the City of Imperial Beach. Therefore, based on the criteria described above, the City of Imperial Beach, Planning and Zoning Division is the lead agency for the proposed project.

C. PURPOSE AND DOCUMENT ORGANIZATION

The City is proposing to implement the Housing Element 2021-2029 Update (project). The purpose of this IS/ND is to evaluate the potential environmental effects and the document is divided into the following sections:

I. INTRODUCTION

This section provides an introduction and describes the purpose and organization of this document.

II. INITIAL STUDY CHECKLIST

This section includes the project background and a detailed description of the project. This section describes the environmental setting for each of the environmental subject areas; evaluates a

range of impacts classified as “no impact,” “less than significant impact,” “less than significant impact with mitigation incorporated,” or “potentially significant impact” in response to the environmental checklist and provides an environmental determination for the project.

III. REFERENCES

This section identifies resources used in the preparation of the IS/ND.

II. INITIAL STUDY CHECKLIST

A. PROJECT DESCRIPTION

1. Project Title:

City of Imperial Beach Housing Element 2021-2029 Update

2. Lead Agency Name and Address:

City of Imperial Beach
Community Development Department
825 Imperial Beach Boulevard
Imperial Beach, CA 91942

3. Lead Agency Contact Person and Phone Number:

Reyna Ayala, Assistant Planner: (619) 628-1356

4. Project Location:

Imperial Beach, California
County of San Diego

The City of Imperial Beach Housing Element 2021-2029 Update would apply to the entire geographic area located within the boundaries of the City of Imperial Beach (City), which encompasses approximately 4.4 square-miles in southwestern San Diego County, approximately 14 miles south of downtown San Diego. **Figure 1, Regional Location Map** shows the boundaries of the City within the San Diego region.

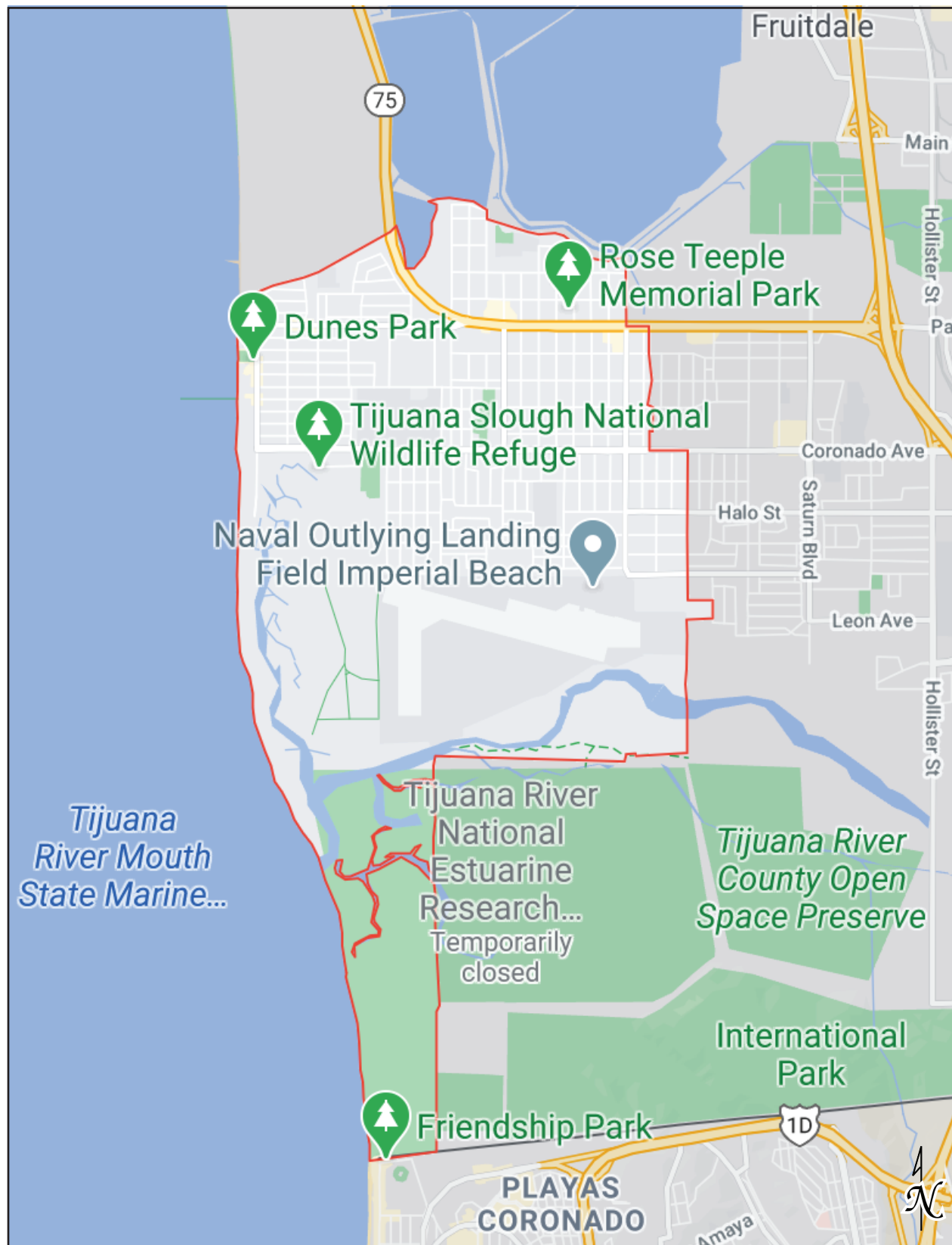
5. Applicant's Name and Address:

City of Imperial Beach

6. General Plan Land Use Designation:

Various, Citywide

The Imperial Beach General Plan and Zoning Ordinance provide for a range of land use designations/zones in the City that can accommodate residential units. Multiple residential and commercial General Plan land use designations within the City provide opportunities for development of housing projects, including: Single Family Residential, Two family Residential, Medium Density Residential (multi-family) and High Density Residential (multi-family), General Commercial and Mixed Use, Seacoast Commercial and Mixed Use, Neighborhood Commercial and Mixed Use, and Seacoast Mixed Use Residential Overlay. The Housing Element 2021-2029 Update does not propose to change any particular parcel's General Plan land use designation.



— = City of Imperial Beach Boundary

Source: GoogleEarth, February 2021.

Figure 1
Regional Vicinity Map

7. Zoning Designation:

Various, Citywide

Multiple residential and commercial General Plan land use designations within the City provide opportunities for development of housing projects at various densities. Residential density within the various zones is calculated at dwelling units per acre (du/acre). Residential uses are permitted in the following zones: R-1-6000 (Single Family - seven du/acre); R-1-3800 (Single Family - 11 du/acre); R-3000 (Two-family - 14 du/acre); R-3000-D (Two-family - 14 du/acre); R-2000 (Multi-family - 29 du/acre); R-1500 (Multi-family - 29 du/acre); C/MU-1 (General Commercial and Mixed Use - 43 du/acre); C/MU-2 (Seacoast Commercial and Mixed Use -24-36 du/acre) and C/MU-3 (Neighborhood Commercial and Mixed Use – 24-36 du/acre). The Housing Element 2021-2029 Update does not propose to change any particular parcel's zoning.

8. Description of Project:

The project is the adoption and implementation of the Imperial Beach Housing Element 2021-2029 Update (project). The Housing Element contains the goals and policies the City of Imperial Beach intends to implement to address a number of important housing-related issues as well as programs to achieve those goals. The following major issue areas are addressed by the goals and policies of this Element:

- Provide a broad range of housing types to meet the needs of existing and future residents;
- Identify and promote adequate sites for future residential development;
- Increase opportunities for homeownership;
- Ensure that existing housing is maintained and preserved; and
- Promote equal housing opportunity for all.

Background

The Housing Element is one of the eight state-mandated elements of the General Plan. The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing strategy, and provides an array of programs to create sustainable, mixed-income neighborhoods across the City.

The current Housing Element was adopted in 2013 and set forth an action plan covering the planning period from 2013 to 2021. There are no major changes proposed to the goals and policies of the current Housing Element adopted in 2013¹, and the project proposes no changes to any particular parcel's zoning or General Plan land use designation. The Housing Element assesses the existing and future housing needs of persons in all economic segments of the City and serves as a tool for decision-makers and the public for understanding and meeting housing needs in Imperial Beach. In the current Housing Element

This Initial Study/Negative Declaration (IS/ND) has been prepared to conform to the requirements of the California Environmental Quality Act (CEQA), the CEQA Guidelines (California Code of Regulations 15000 et seq.), and the regulations and policies of the City of Imperial Beach. By state mandate, each

¹The Housing Element contains **Appendix B, Review of Previous Housing Element** which identifies the five goals for the City of Imperial Beach for the 2013-2021 planning period on page B-1.

city and county in California is required to plan for the housing needs for its share of the expected new households in the region through periodic updates to the Housing Element. While the law does not require local governments to actually construct housing to meet identified needs, it does require that the community address housing needs in its discretionary planning actions by creating opportunities for housing in the land use plan and facilitating housing development through policy.

Housing Element Law

The Housing Element Law, enacted in 1969, mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community through the preparation of a Housing Element. The law requires local governments to adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. The law requires the update of the Housing Element every eight years to reflect the most recent trends in demographics and employment. Pursuant to these requirements, the City of Imperial Beach is required to update the Housing Element. The Housing Element Update would establish policies, goals, and programs for the City to accommodate the City's required housing needs allocation as determined by the San Diego Association of Governments (SANDAG) in the Regional Housing Needs Assessment (RHNA). The Housing Element Update is required to be adopted in June 2021 and will be in effect through October 2029.

The Housing Element Law also requires that the Department of Housing and Community Development (HCD) review local housing elements for compliance with state law and report written findings to the local government. The City submitted the draft Housing Element to HCD on January 21, 2021. Following release of the draft Housing Element, HCD will provide comments to the City during its 60-day review, which will be incorporated in a revised Housing Element before adoption. Adoption of the Housing Element is anticipated to occur in June 2021, within the 120-day grace period of the statutory deadline.

This study analyzes the programs and policies contained in the draft Housing Element that have the potential to result in physical environmental effects and the inventory of opportunity sites needed to demonstrate zoned capacity needed to accommodate the City's RHNA allocation, in addition to the construction and operation of 1,329 housing units, which is intended to provide a conservative analysis of the "worst-case" scenario of environmental impacts from future implementation of the 2021-2029 Housing Element.

Since the adoption of the 2013-2021 Housing Element, the California State Legislature adopted several key bills that imposed additional requirements on the Housing Element Update. These recent changes are summarized as follows:

Affirmatively Furthering Fair Housing (AB 686)

Pursuant to Assembly Bill (AB) 686 (2018), the Housing Element must include an analysis and determination of consistency with Affirmatively Furthering Fair Housing (AFFH) requirements. AFFH means "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. These actions must, when taken together, address significant disparities in housing needs and in access to opportunity, replace segregated living patterns with truly integrated and balanced living patterns, transform racially and ethnically concentrated areas of

poverty into areas of opportunity, and foster and maintain compliance with civil rights and fair housing laws.

To comply with these requirements, the implementation programs of the Housing Element must affirmatively further fair housing and must include an assessment of fair housing. Additionally, the list of opportunity sites suitable for housing development must be identified throughout the City in a manner that affirmatively furthers fair housing opportunities. For purposes of the housing element site inventory, this means that sites identified to accommodate the lower-income portion of the RHNA are not concentrated in low-resourced areas (lack of access to high performing schools, proximity to jobs, location disproportionately exposed to pollution or other health impacts) or areas of segregation and concentrations of poverty. Sites identified to accommodate the lower income RHNA must be distributed throughout the community in a manner that affirmatively furthers fair housing.

To conduct this analysis, the City utilized the California Tax Credit Allocation Committee (TCAC)/California Department of Housing and Community Development (HCD) Opportunity which can be accessed at <https://www.treasurer.ca.gov/ctcac/opportunity.asp>. Analysis of the fair housing issues was also from the 2020 San Diego Regional Analysis of Impediments to Fair Housing Choice, in which the City of Imperial Beach participated.

Additional Requirements Related to the Opportunity Sites List (AB 1397 and SB 166)

Since the 5th cycle Housing Element was adopted in 2013, the State Legislature has adopted several bills which strengthen requirements related to the opportunity sites list. Among these, the most significant are AB 1397 (2017) and SB (2017), which imposed several key new requirements. These new requirements are summarized as follows:

Enhanced Requirements: Realistic Development Potential (AB 1397)

Assembly Bill 1397 requires that, for each site included in the inventory, the City identify the realistic development potential for the site within the eight-year planning period. For non- vacant sites, the methodology used to identify realistic development potential must consider factors such as existing uses, past development trends, market conditions, and the availability of regulatory and/or other development incentives.

No Net Loss (SB 166)

Senate Bill 166 amended the existing No Net Loss Law to require sufficient adequate sites to be available at all times throughout the Housing Element planning period to meet a jurisdiction's remaining unmet RHNA goals for each income category. To comply with the No Net Loss Law, as jurisdictions make decisions regarding zoning and land use, or development occurs, jurisdictions must assess their ability to accommodate new housing in each income category on the remaining sites in their housing element site inventories. A jurisdiction must add additional sites to its inventory if land use decisions or development results in a shortfall of sufficient sites to accommodate its remaining housing need for each income category. In particular, a jurisdiction may be required to identify additional sites according to the No Net Loss Law if a jurisdiction rezones a site or if the jurisdiction approves a project at a different income level or lower density than shown in the opportunity sites list. Lower density means fewer units than the capacity assumed in the site inventory.

To ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period, HCD recommends that jurisdiction create a buffer in the housing element inventory of at least 15 to 30 percent more capacity than required, especially for capacity to accommodate the lower income RHNA. Jurisdictions can also create a buffer by projecting site capacity at less than the maximum density to allow for some reductions in density at a project level.

Rezoning for Re-Use of Sites to Accommodate Lower Income RHNA (20 percent inclusionary, By-right)

Sites identified to accommodate the lower-income RHNA are subject to additional requirements if they were identified in a previous planning period. Generally, these requirements would apply to the use of non-vacant site that was identified in the prior planning period's housing element (i.e., 5th cycle Housing Element), or to the use of a vacant site that was identified in two or more consecutive planning periods (i.e., 5th and 4th cycle Housing Elements).

When sites meeting these conditions are used to accommodate the lower-income RHNA, the jurisdiction's Housing Element must include a program to be completed within three years of the beginning of the planning period to allow residential use by-right at specified densities for housing developments in which at least 20 percent of the units are affordable to lower income households. Sites where zoning already permits residential "use by-right" as set forth in Government Code Section 65583.2 (i) at the beginning of the planning period would be considered to meet this requirement.

Replacement Requirements

Government Code Section 65583.2(g)(3) now requires that the Housing Element include a program to impose housing replacement requirements on certain sites identified in the Sites Inventory. These replacement requirements would require the replacement of units affordable to the same or lower income level as a condition of any development on a non-vacant site consistent with those requirements set forth in State Density Bonus Law (Government Code Section 65915(c)(3).)

The housing replacement requirements would be required for sites identified in the opportunity sites list that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, and:

- Were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income; or
- Subject to any other form of rent or price control through a public entity's valid exercise of its police power; or
- Occupied by low or very low-income households.

Required Rezoning to Accommodate Shortfall

If, after completing the Inventory of Sites, the City concludes that there is a shortfall of sites to accommodate the RHNA allocation, then the Housing Element must include a program to identify sites that can be rezoned during the planning period. For any shortfall of sites to accommodate the lower-income RHNA, the Housing Element is required to include an inventory of potential sites for rezoning, and those sites must meet the adequate sites requirements in terms of suitability and availability.

Sites identified to meet the rezoning need for a lower-income shortfall must comply with a set of specific parameters, including the requirement that the site:

- Permit owner-occupied and rental multi-family uses by-right for developments in which 20 percent or more of the units are affordable to lower income households.
- Permit the development of at least 16 units per site.
- Permit a minimum of 20 dwelling units per acre.
- Ensure a) at least 50 percent of the shortfall of low- and very low-income regional housing need can be accommodated on sites designated for exclusively residential uses, or b) if accommodating more than 50 percent of the low- and very low-income regional housing need on sites designated for mixed-uses, all sites designated for mixed-uses must allow 100 percent residential use and require residential use to occupy at least 50 percent of the floor area in a mixed-use project.

The requirements to identify an inventory of sites for rezoning within the Housing Element Programs do not apply to rezoning that may be required to accommodate a Moderate Income or Above Moderate Income RHNA shortfall. Following the adoption of the Housing Element, jurisdictions have three years to adopt the rezoning, with some ability for extensions based on specific criteria. No rezoning is required or proposed by the 2021-2029 Housing Element Update.

Additional Requirements Related to the General Plan – AB 162 (2007), SB 1241 (2012), SB 99 (2019), AB 747 (2019), SB 1035 (2018), SB 379 (2015), and SB 1000 (2016)

Several recent state laws require the City to make updates to other sections of the General Plan alongside the update to the Housing Element. These laws place a particular emphasis on the Safety Element, with an expanded focus on planning for flooding, wildfires, and climate change impacts. Through the City’s annual General Plan implementation review process, the City will ensure internal consistency among the various elements of the General Plan. Additionally, SB 1000 expands requirements surrounding Environmental Justice.

RHNA Requirement/Allocation

The RHNA is mandated by state law as part of the periodic process of updating local housing elements of the General Plan. The RHNA allocation process begins with a regional determination figure (the total number of housing units needed to meet housing needs in the SANDAG region) issued by HCD, followed by an allocation to each jurisdiction within the region (specific number of units allocated to each jurisdiction). In prior Housing Element cycles, the regional determination figure was based solely on projected housing need during an eight-year planning period. Recent changes to state law added a requirement that existing housing need must be incorporated in the regional determination by considering housing need indicators such as vacancy rates, jobs/housing balance, cost burden, and overcrowding.

SANDAG is mandated to allocate the regional housing need set by HCD to city and county jurisdictions in the region. In allocating the region’s future housing needs to jurisdictions, SANDAG is required to take the following factors into consideration pursuant to Section 65584 of the State Government Code:

- Market demand for housing;
- Employment opportunities;

- Availability of suitable sites and public facilities;
- Commuting patterns;
- Type and tenure of housing;
- Loss of units in assisted housing developments;
- Over-concentration of lower income households; and
- Geological and topographical constraints.

The RHNA for the SANDAG region was adopted in August 2020 covering a planning period from June 30, 2020 through April 15, 2029. The major goal of the RHNA is to assure a fair distribution of housing among cities and counties within the San Diego region, so that every community provides an opportunity for a mix of housing for all economic segments. The housing allocation targets are not building requirements, but goals for each community to accommodate through appropriate planning policies and land use regulations. Allocation targets are intended to assure that adequate sites and zoning are made available to address anticipated housing demand during the planning period.

The City of Imperial Beach's share of regional future housing needs per the RHNA is a total of 1,329 new units for the 2021-2029 Housing Element. This allocation is distributed into various income categories, as shown in **Table 1, Imperial Beach Housing Needs for 2021-2029 Housing Element**. The RHNA includes a fair share adjustment which allocates future (construction) need by each income category in a way that meets the State mandate to reduce the over-concentration of lower income households in one community or areas within the region.

Table 1
Imperial Beach Housing Needs for 2021-2029 Housing Element

Income Category (% of County AMI)	Number of Units	Percent
Extremely Low (30% or less) ¹	113	8.5%
Very Low (31 to 50%) ¹	112	8.4%
Low (51 to 80%)	123	9.3%
Moderate (81 to 120%)	183	13.8%
Above Moderate (Over 120%)	798	60%
Total	1,329	100%
AMI = Area Median Income 1 The City has a RHNA allocation of 225 very low-income units (inclusive of extremely low-income units. Pursuant to State law (AB 2634), the City must project the number of extremely low-income housing needs based on Census income distribution or assume 50 percent of the very low-income units as extremely low. According to the CHAS data developed by HUD (Table H-10 in Housing Element, 18.5% of the City households were extremely low income and 18% were very low income. Therefore, the 225 very low income households are split evenly. However, for purposes of identifying adequate sites for the RHNA allocation, State law does not mandate the separate accounting for the extremely low income category. Source: Final Regional Housing Needs Allocation, SANDAG, August 2020.		

Under the RHNA allocation, the City is required to provide the zoned capacity to accommodate the development of at least 1,329 residential units using various land use planning strategies. The City provides capacity for housing through local zoning regulations. The City, however, is not required to physically construct 1,329 units as a result of the RHNA allocation.

Credits toward RHNA

The 6th cycle RHNA covers a planning period of almost nine years beginning starting on June 30, 2020. Housing units built, under construction, or approved June 30, 2020 onward can be credited towards meeting the City's RHNA. These units can be subtracted from the City's share of regional housing needs. Per the 2021-2029 Housing Element, the City must demonstrate its ability to meet the remaining housing needs, through the provision of sites, after subtracting units under construction or anticipated. **Table 2, Credits Toward RHNA**, summarizes the projects that can be credited.

Table 2
Credits Toward RHNA

	Unit Type	Very Low	Low	Moderate	Above Moderate	Total
RHNA		225	123	183	798	1,329
Net Units Entitled (Not Permitted) as of 7/1/2020						
829 Emory St.	ADU	---	---	1	---	1
236-238 Palm Ave.	Mixed Use	---	---	---	12	12
552 4th Street	SF	---	---	---	1	1
415 Delaware Street	Condo	---	---	---	2	2
575 8th Street	SF	---	---	---	2	2
571 11th Street	Condo	---	---	---	3	3
119-121 Date Ave	Duplex	---	---	1	---	1
550 Highway 75	Mixed Use/ Condo	---	---	---	51	51
821-825 10th St	SF and ADU	---	---	1	---	1
183-185 Evergreen Ave	SF	---	---	---	1	1
189 Elm Avenue	Condo	---	---	---	2	2
Subtotal:		0	0	3	74	77
Net Units Pending Approval as of 7/1/2020						
670 Ocean Lane	SF	---	---	---	1	1
626-381-16-00	SF	---	---	---	1	1
495 Palm Ave	MF	---	---	9	---	9
409 Palm Avenue	Condo	---	---	---	74	74
1166-1174 Seacoast Drive	Condo	---	---	---	4	4
464-482 7th St.	Condo	---	---	---	5	5
1085 Palm Avenue	Condo	---	---	---	6	6
276 Elm Avenue	SF	---	---	---	1	1
843 Georgia St.	Condo	---	---	---	1	1
130 Daisy Ave.	Condo	---	---	---	2	2
284 Elder Ave.	Condo	---	---	---	1	1
374 Imperial Beach Blvd	Duplex	---	---	1	---	1
916 10th Street	Condo	---	---	---	2	2
Subtotal:		0	0	10	98	108
Remaining RHNA		225	123	170	626	1,144
<i>Source: City of Imperial Beach, 2021</i>						

Units Approved: As of July 1, 2020, the City entitled a total of 77 housing units, including Accessory Dwelling Units (ADUs), duplex units, condominiums, and single-family homes. Only the duplex and ADUs are considered affordable to moderate income households (refer to Table H-29 and Table H-30 in the Housing Element), where moderate income households can generally afford apartment rentals in the City.

Units Pending Approval: As of July 1, 2020, a total of 108 units were at various stages of review and approval. Only the duplex and apartment units are considered affordable to moderate income households. The remaining are presumed to be affordable only to above moderate income households.

Remaining Housing Need to be Accommodated: After accounting for units approved and pending approval, a remaining need of 1,144 units exists as identified in **Table 2, Credits Toward RHNA**, above. The City must demonstrate the availability of sites with appropriate zoning and development standards that can facilitate and encourage the development of such units by April 15, 2029.

Potential ADU

New State laws passed since 2017 have substantially relaxed the development standards and procedures for the construction of Accessory Dwelling Units (ADUs). As a result, the City has seen significant increases in ADUs in the community, increasing from just a few units annually in 2017 and 2018, to 12 units in 2019, and by October 2020, 22 units had already been permitted during the first 10 months of the year. Based on this steeply upward trend, the City anticipates permitting at least 25 ADUs in 2020. For the purpose of RHNA credits, the City assumes 25 ADUs annually for a total of 200 ADUs over the eight-year planning period of the Housing Element. Given the housing affordability analysis contained in the Community Profile of the Housing Element, the City expects that all new ADUs to be affordable to moderate income households.

Residential Sites Inventory

State law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate that jurisdiction's share of the region's projected growth. As part of this Housing Element update, the City identified residential sites that could accommodate Imperial Beach's future housing needs through an evaluation of vacant and underutilized residential and mixed-use properties with potential for residential development within the timeframe of the Housing Element. In Appendix C, to the Housing Element, Table C-1, Residential Sites Inventory provides a detailed survey of almost 500 hundred parcels that were appropriate for residential recycling or mixed-use development. The location of the parcels is depicted in **Figure 2, Location Sites for RHNA**.

Pipeline Projects

The City of Imperial Beach owns a 0.29-acre site zoned for High Density Residential (R-1500). The City plans to solicit affordable housing development proposals on this site and anticipates accommodating between 10 and 35 affordable units on site. Another property of 1.51 acres is currently zoned Single-Family Residential (R-1-6000) and High Density Residential (R-1500). However, the property owner has contacted the City with a plan to construct a 68-unit supportive housing. These two projects can potentially increase the City's affordable housing inventory by 78 to 103 units.

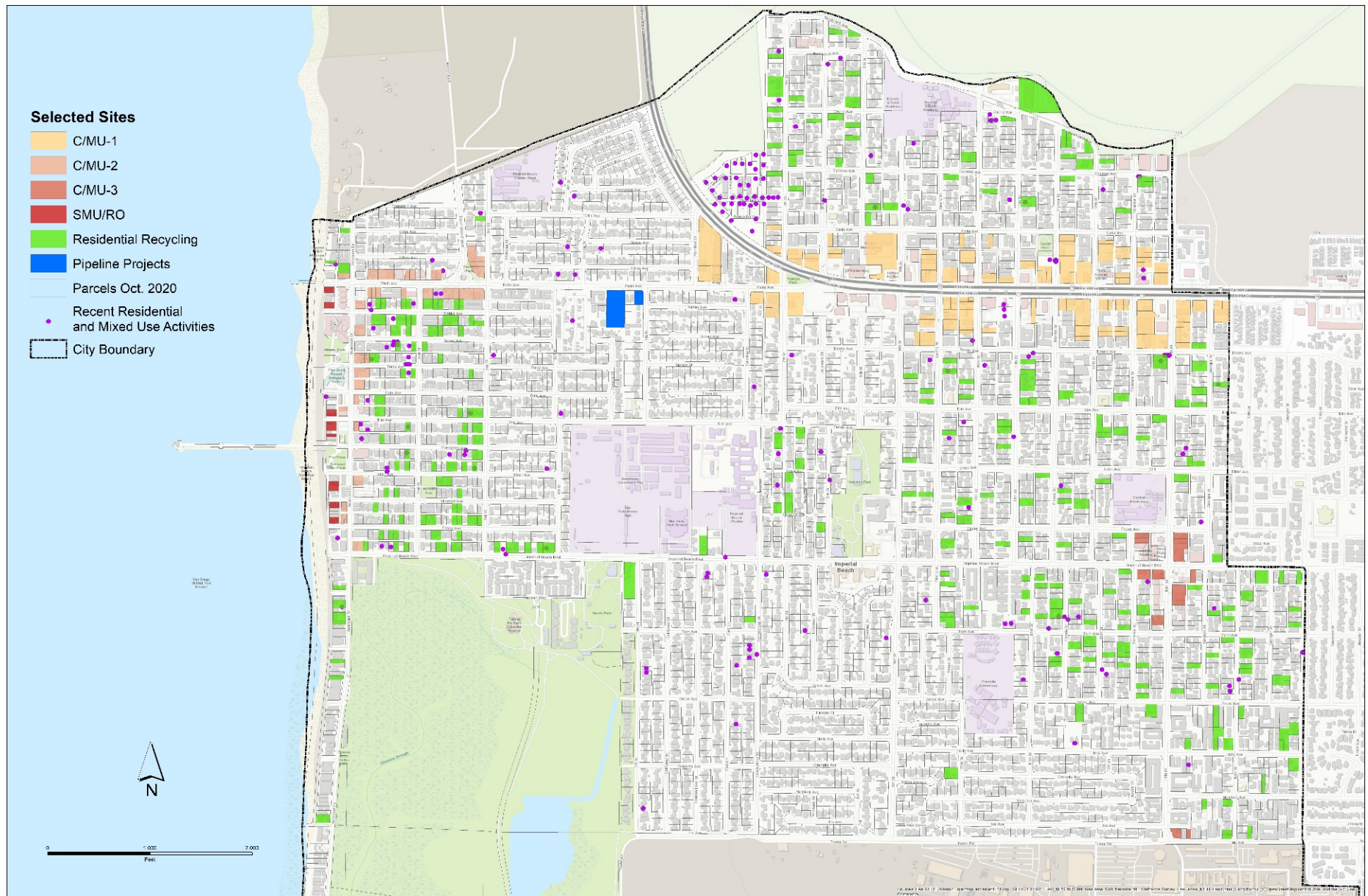


Figure 2
Location Sites for RHNA

Residential Recycling

The City has nearly 400 acres of land zoned R-3000, R-3000-D, R-2000, and R-1500. In the five-year period between 2015 and 2020, over 80 properties have been developed into higher intensity uses, primarily from single-family units and mobile home lots to duplex/triplex units, and small apartment and condominium complexes, and also including the redevelopment of an RV park. Redevelopment of these medium-high density residential properties has created 334 housing units, yielding a net increase of 286 housing. The City anticipates this recycling trend to continue.

To identify additional residentially zoned parcels with potential for new development or recycling opportunities, the following criteria were used:

- Parcel is currently vacant; or
- If parcel is not vacant:
 - Land value is greater than improvement value
 - Structure was built prior to 1990 (and therefore over 30 years of age)
 - Existing uses are not condominiums or apartments
 - Redevelopment can at least double the number of units existing on site

A total of 303 parcels meets these criteria, including a few vacant residential parcels. The majority of the parcels are zoned R-2000, R-3000, and R-3000-D. These parcels can potentially yield 710 gross units, assuming development at 80 percent of the allowable densities. These parcels, without considering potential for lot consolidation, can yield 412 net units. Most of the parcels are small and even with lot consolidation, would not form development sites of 0.5 acre or larger. Therefore, while the majority of the sites are zoned for higher density development, they are assumed to be feasible for facilitating moderate income housing.

Development in Mixed Use Districts

The City's residential neighborhoods are primarily built out. Future residential development will rely on underutilized commercial properties where residential uses are permitted, as in the City's C/MU-1, C/MU-2, C/MU-3, and SMU/RO areas.

To initially identify vacant and underutilized commercial properties for potential residential or mixed use development, the following criteria were used:

- Parcel is currently vacant; or
- If parcel is not vacant:
 - Land value is greater than improvement value
 - Structure was built prior to 1990 (and therefore over 30 years of age)

The resultant parcels were reviewed other additional criteria:

- General characteristics such as declining uses, low existing Floor Area Ratio (FAR), and COVID-impacted uses, among others
- Location near recent mixed use or residential development activities on properties exhibiting similar characteristics.
- Expressed interests from property owners or developers
- Potential for lot consolidation

The City has identified 172 parcels (39.8 acres) zoned for and commercial/mixed use that are underutilized and appropriate for redevelopment. Although some portions of each of these sites are developed with existing commercial, manufacturing, and/or residential uses, the existing uses are of marginal economic viability, the structures are at or near the end of their useful life, and/or the existing intensity of development is substantially lower than allowed by existing zoning. Furthermore, the current COVID-19 pandemic has seriously impacted the viability of many retail, service, and restaurant businesses. In most cases, redevelopment of these sites in recently years almost always are mixed use or residential-only projects.

Most sites are adjacent or in close proximity to each other and are appropriate for consolidation into large development projects. Potential for lot consolidation is also identified in the detailed sites inventory in Appendix C of the Housing Element. The Housing Plan section of the Housing Element identifies incentives for lot consolidation. Given these existing conditions and the zoning capacity for higher density residential, the City feels these sites are the most viable redevelopment opportunities to accommodate the housing need within the planning period. Appendix C of the Housing Element includes a detailed listing of the parcels identified and photo documentation of existing conditions.

Realistic Capacity Assumptions

Over the past five years, the City has seen increasing interest in mixed use development. The C/MU-2, C/MU-3, and SMU/RO districts have a base density of 29 units per acre but can reach 36 units per acre with the approval of a CUP. As shown in **Table 3, Recent Mixed Use and Multi-Family Developments**, with the exception of one project, all mixed use projects in the C/MU-2, C/MU-3 and SMU/RO zones applied for and were approved for the increased density. Average development density exceeds base density due to inclusion of affordable units. Projects eligible for 36 units per acre averaged at 87 percent or 31 units per acre. Therefore, for the purpose of estimating development potential in C/MU-2, C/MU-3, and SMU/RO zones, the base density of 29 units per acre is used. For C/MU-1 where the density can reach 43 units per acre, a conservative 34 units per acre (80 percent) is used.

For residential development in the R-1500 and R-3000 zones, the average density yield for the most recent project is 95 percent. Conservatively, residential recycling is estimated at 80 percent of the allowable density.

Table 3
Recent Mixed Use and Multi-Family Developments

Address	Zoning	Project	# Units (Entitled Constructed, or Proposed)	# Units Allowed		% of Units Allowed	
				Base Density	CUP Density	Base Density	CUP Density
951 Seacoast Dr.	C/MU-2	Commercial/ Residential	3	3	3	100%	100%
110 Evergreen Ave.	C/MU-2	Commercial/ Residential	11	9	11	122%	100%
550 Highway 75	C/MU-1	Hotel/ Condo	51	56	--	91%	--
801 Seacoast Dr.	C/MU-2	Commercial/ Residential	6	9	11	67%	55%
744 Emory Street	C/MU-1	Commercial/ Residential	11	11	--	100%	--
236-238 Palm Ave.	C/MU-2	Commercial/ Residential	14	11	14	127%	100%

Table 3
Recent Mixed Use and Multi-Family Developments

Address	Zoning	Project	# Units (Entitled Constructed, or Proposed)	# Units Allowed		% of Units Allowed	
				Base Density	CUP Density	Base Density	CUP Density
409 Palm Ave.	R-1500	Multi-Family	23	26	--	88%	--
	R-3000		51	52	--	98%	--
Average:						96%	87%
Source: City of Imperial Beach Housing Element, 2021							

Affordability Assumptions

The realistic capacity of the City's vacant and underutilized sites plus anticipated ADUs could result in 2,076 new dwelling units between 2021 and 2029. In addition, pipeline projects can potentially add 78 to 103 units to the City's affordable housing inventory.

Government Code Section 65583.2(c)(3)(B) allows local governments to utilize a "default" numerical density standard for establishing adequate zoning to accommodate lower income housing. The City's three C/MU-2, C/MN-2 and SMU/RO zones with base density of 29 units per acre and CUP density of 36 units per acre, along with C/MU-1 at 43 units per acre, can accommodate an estimated 804 lower income units. However, sites that do not meet the 0.5 acre size threshold or cannot accommodate at least 16 net units would be allocated to the moderate income category, yielding about 352 units.

The housing market analysis in the Community Profile of this Housing Element demonstrates that moderate income households can afford to a wide range of rental options and purchase a median priced home in Imperial Beach. Thus, the City assumes that sites in R-3000, R-3000-D, R-2000, and R-1500 zones can accommodate 396 moderate income units. The R-1-6000 and R-1-3800 sites can facilitate 16 above moderate income units.

Summary of Sites Capacity

Table 4, Vacant and Underutilized Sites Summary provides a summary of the detailed inventory of vacant and underutilized sites contained in Appendix C of the Housing Element.

Table 4
Vacant and Underutilized Sites Summary

Zoning	Parcel Count	Total Acres	Max Density	Realistic Capacity (Net Units)	Affordability
<i>Vacant</i>					
R-1-6000	2	0.26	7 du/a	2	Above
R-3000-D	2	0.35	14 du/a	4	Moderate
R-2000	5	0.95	21 du/a	16	Moderate
R-1500	2	0.18	29 du/a	5	Moderate
<i>Non-vacant</i>					
R-1-6000	3	1.57	7 du/a	6	Above
R-1-3800	8	1.63	11 du/a	9	Above
R-3000 & R-3000-D	147	16.16	14 du/a	195	Moderate
R-2000	124	28.62	21 du/a	151	Moderate
R-1500	10	1.65	29 du/a	24	Moderate
SMU/RO	15	1.57	29-36 du/a	34	Moderate

Table 4
Vacant and Underutilized Sites Summary

Zoning	Parcel Count	Total Acres	Max Density	Realistic Capacity (Net Units)	Affordability
C/MU-3	9	1.72	29-36 du/a	46	Lower
C/MU-3	7	1.23	29-36 du/a	29	Moderate
C/MU-2	13	1.89	29-36 du/a	48	Lower
C/MU-2	24	3.49	29-36 du/a	79	Moderate
C/MU-1	69	22.69	43 du/a	710	Lower
C/MU-1	35	7.28	43 du/a	210	Moderate
<i>Notes: Summary data rounded down by parcel.¹</i> <i>*Assumes that the sites will develop with at least one unit per lot or at an average of 80 percent maximum allowable density. Summary data rounded down by parcel.</i> <i>**Assumes that only 50 percent of the commercial sites will develop as mixed use with a residential component.</i> <i>Source: City of Imperial Beach Housing Element, 2021</i>					

RHNA Credits and Remaining Need

The following table, **Table 5, RHNA Accommodations** summarizes the City's accommodation of the RHNA for all income groups during the 2021-2029 planning period. After accounting for development credits, anticipated ADUs, and realistic capacity of vacant and underutilized sites, the City has identified surplus capacity of 625 to 650 units in the lower and moderate income units.

Table 5
RHNA Accommodation

Income	RHNA	Entitled/ Pending	Anticipated ADUs	Residential Sites	Mixed Use Sites	Pipeline Projects	Surplus/ Shortage
Very Low (<50% AMI)	225	0	0	0	804	78-103	534-559
Low (51-80% AMI)	123	0	0	0			
Moderate (81-120% AMI)	183	10	200	395	352	0	774
Above Moderate (>120% AMI)	798	98	0	17	0	0	-683
Total	1,329	108	200	412	1,156	78-103	625-650
<i>Source: City of Imperial Beach Housing Element, 2021</i>							

9. Surrounding Land Uses and Setting:

The City of Imperial Beach has the distinction as the most southwesterly community in the continental United States and covers 4.4 square miles. The City is bordered by the City of Tijuana to the south, San Diego Bay and City of Coronado to the north, and City of San Diego to the east. Open space is the largest land use designation in the city, with 39 percent of the City's acreage consisting of environmentally protected open space habitat in the Tijuana River watershed, and 14 percent consisting of "Urban Reserve," which comprises the U.S. Navy Outlying Landing Field helicopter training facility.

The City of Imperial Beach, often referred to as the "Most Southwesterly City in the Continental United States," is one of 18 incorporated cities located within San Diego County. Located approximately 14 miles south of downtown San Diego, Imperial Beach contains an area of 4.4 square miles. The City is bordered by the City of Tijuana to the south, San Diego Bay and City of Coronado to the north, and City of San Diego

to the east and the Pacific Ocean on the west. Open space is the largest land use designation in the city, with 39 percent of the City's acreage consisting of environmentally protected open space habitat in the Tijuana River watershed, and 14 percent consisting of "Urban Reserve," which comprises the U.S. Navy Outlying Landing Field helicopter training facility. Imperial Beach is a coastal city with a Mediterranean climate. The urbanized area of the City is almost entirely built out with a few vacant parcels. Future development will primarily take place through upgrading and reuse of existing parcels.

10. Other Public Agencies Whose Approval Is Required:

The California Department of Housing and Community Development reviews and determines whether the Housing Element Update complies with State of California law. No other approvals by outside public agencies are required.

11. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1:

The City of Imperial Beach typically initiates consultation with the Lipay Nation of Santa Ysabel and their designated tribal representative for their participation in the Housing Element update and requested information regarding tribal cultural resources within the City on February 18, 2021.

B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors that would be potentially affected by this project and are mitigated to a less than significant impact are indicated below.

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

C. DETERMINATION

On the basis of this initial evaluation:

- ☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because of the incorporated mitigation measures and 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 the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) 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.



Signature

April 16, 2021

Date

Reyna Ayala

Printed Name

Assistant Planner

Title

D. EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources cited. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards.
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect, and construction as well as operational impacts.
- 3) A “Less Than Significant Impact” applies when the proposed project would not result in a substantial and adverse change in the environment. This impact level does not require mitigation measures.
- 4) “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect is significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 5) “Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The initial study must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Except as provided in Public Resources Code Section 21099 would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcrops, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Setting

Scenic Vistas and Scenic Resources

Imperial Beach is a small coastal city surrounded by the San Diego Bay and Silver Strand to the north; the Tijuana River Estuary to the south; and the Pacific Ocean to the west. Development is concentrated and does not encroach on the adjacent expansive open space and natural features. The built environment is comprised primarily of one and two structures that do not obstruct the natural landscape. There are several and varied scenic vistas and views of the natural settings including an open vista to the Pacific Ocean, a panorama of surf and ocean, views of tidal infill at sunset or the sweeping view of the Playa de Tijuana skyline and Tijuana bullfight ring contrasting with the natural openness of the Tijuana River Estuary. Visual and Scenic Resources specific to Imperial Beach include the following:

Pacific Ocean

The Pacific Ocean is perhaps the most scenic resource in Imperial Beach. Whether the view is an unobstructed view of the ocean and horizon, views framed by built or natural features or even a peekaboo view it's a scenic vista unmatched by any non-coastal city.

The Tijuana River Estuary

The Tijuana River Estuary offers one of the most unique scenic resources. The Tijuana River Estuary can be viewed from several vantage points, a few of which are the Mesa bluff-top in Border Field State Park, the southern terminus of Seacoast Drive and along Imperial Beach Boulevard.

Depending from which vantage point the Tijuana River Estuary is viewed, the character of perception of the area changes dramatically. This is due to the interplay of different visual aspects. Views along Imperial

Beach Boulevard focus on the Tijuana bullfight ring and Mesa Bluff-top area, which act as the terminal features of the vista. This terminal point sets the theme of the view; a vast expanse of open space separating two urban areas, in fact, two countries. From the end of the Seacoast Drive, the narrow waterways form a visual axis which is essentially a linear element transversing the view. The waterways, become the dominant feature. The view presents as a wet-land type habitat between the shore and inland development. The final viewing point is the Mesa bluff-top of Border Field State Park. This spot, itself a terminal point of another vista, produces a reverse interest view. From the bluff-top, one views a panoramic coastline scene ranging from the beaches below, along the coast past the estuary to Imperial Beach and Coronado.

The Estuary and Slough define the boundary between the urbanized City and the natural undeveloped City. This space has had an influence on all the people of Imperial Beach, either as a recreational resource, a place to go for solitude, or as an environmental resource.

The City Beach

A unique scenic resource, the City beach encompasses the area from the Northern City limits, south to the International Border. This area has numerous focal points ranging from the City Pier, to the variety of building types, to the sandy beach. Daytime views include the Coronado Islands, the beach itself, the ocean, the Silver Strand, Coronado, Point Loma, and Downtown San Diego. Nighttime views include lights on the pier, lights on the ocean, Point Loma, the Coronado Bridge, Coronado and Downtown San Diego.

Salt Evaporation Ponds and South San Diego Bay

The salt evaporative ponds act as the gateway to Imperial Beach as one enters into the City along State Highway 75 from either the Silver Strand area or from Interstate 5. Unlike the Pacific Ocean, these ponds are small enough to be easily understood visually. They serve as important gateways to the City. There are excellent nighttime views of the Coronado Bridge and Downtown San Diego.

Visual Character

A wide variety of natural and built features contribute to the character of Imperial Beach. Extensive open space encircles the City to the west, south and north as described above. The City is small coastal town that is primarily developed with residential uses in the urban core. Open space comprises the largest land use designation in the city, with 39 percent of the City's acreage consisting of environmentally protected open space habitat in the Tijuana River watershed, and 14 percent consisting of "Urban Reserve," which comprises the U.S. Navy Outlying Landing Field helicopter training facility.

Imperial Beach boasts three and one-half miles of beach frontage available for visitors to walk along miles of shoreline, surf, swim, build sand castles, or enjoy the view from the quarter mile long wooden pier. Commercial and mixed-use areas on the west side of the City tend to be beach oriented, visitor serving, recreational and pedestrian friendly. Coastal access is provided along Seacoast Drive with purposely spaced wide open views in between two- to four-story multi-family residential developments along Seacoast Drive. Although the urban center of City is built-out with few vacant parcels, it is a small-scale, man-made environment developed with primarily one- or two-story buildings in generally compact and well-defined neighborhoods.

Light and Glare

Much of the planning area is developed with established existing sources of light and glare, such as street lights and parking lights, walkway lights, lighted recreational facilities, and light emitted from residential and nonresidential buildings. Although open space surrounds the City on three sides, it is adjacent to active urban areas to the east. While the City's single-family residential neighborhoods are generally not subject to substantial night lighting, many commercial areas do experience greater lighting effects.

Regulatory Setting

Regulations exist at state and local levels that guide development and influence the physical form and aesthetic character of the City and include:

- Imperial Beach Municipal Code and Zoning ordinance
- Imperial Beach General Plan and Local Coastal Plan
- Imperial Beach Design Review Board
- Local Coastal Commission (87 percent of the City falls within the Local Coastal Plan boundaries)
- California Scenic Highway Program

Checklist Discussion

a) & c) No Impact.

The 2021-2029 Housing Element Update in and of itself does not propose or authorize any projects or development plan. The Housing Element sets forth the City's policies and detailed programs for meeting existing and future housing needs as determined by the RHNA process, for preserving and enhancing neighborhoods, and for increasing affordable housing opportunities for extremely low, very-low, low and moderate income persons and households. The Housing Element was prepared for consistency with the General Plan and Zoning Ordinance.

Future development will be required to adhere to all city design guidelines and standards including the Zoning Ordinance, the Land Use Plan, the Design Element of the GP/LCP and any additional specific development guidelines for a particular area. The City's Zoning Ordinance contains development standards for each zoning district, consistent with the land use designations of the General Plan, to ensure quality development in the community. The intent of the Design 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. Additionally, individual future project proposals with two or more residential units and mixed use developments will be submitted to the Design Review and Site Plan 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.

As all future projects would be developed on sites that are zoned for residential or mixed-use and commercial areas. No areas currently designated as open space will be converted to urban uses and no development will be permitted to encroach on open space.

All future projects will be treated as individual projects and may be subject to specific environmental analysis. Nevertheless, there are no policies in the Housing Element which either permit or promote

development in areas that aren't currently developed with existing uses. There are no policies or programs in the Housing Element that would directly affect scenic vistas nor any that would degrade the visual character of the City. The Project would therefore have **no impact**

b) *No Impact.*

The only scenic highway in the vicinity of Imperial Beach is SR-75 at the northern boundary of the City. 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 (Imperial Beach GP/LCP Negative Declaration, 2019). As the Housing Element does not propose any specific development projects, no damage to trees, rock outcroppings, or historic buildings will occur within a scenic highway. Moreover SR-75 is a designated State Scenic Highway at the northern boundary of City, not within Imperial Beach. Therefore, there would be **no impact**.

d) *No Impact.*

As previously stated, the 2021-2029 Housing Element Update in itself does not propose or authorize any projects or development plan. Future development would occur in areas that are currently urbanized and commonly experience the impacts of existing light sources. Future development will likely replace existing development and will therefore not introduce additional light and glare impacts. Future development in the City would be required to be designed and constructed in accordance with the Imperial Beach Zoning Ordinance to prevent spillover light effects or the use of materials that would create new glare. Therefore, the Housing Element 2021-2029 Update would have **no impact** on light and glare.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURE AND FORESTRY RESOURCES. 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 nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forestland (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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forestland or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Setting

The City of Imperial Beach is an urban environment designated for residential and commercial use and is essentially built out. There is no land within the City of Imperial Beach designated or zoned for agricultural use, farmland, forest, or timber production nor are there any existing agricultural, farmland, forest or timber production uses. Pursuant to the Farmland Mapping and Monitoring Program, the project site is designated as Urban and Built Up Land (California Department of Conservation 2018).

Checklist Discussion

a), b), c), d), e) No Impact.

The Housing Element update does not propose or authorize any development nor does it propose any changes to existing land uses. The project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. No land within the City of Imperial Beach is subject to the Williamson Act contract. As mentioned above, the City of Imperial Beach does not have any land that is designated or zoned for forest use or timber production. Additionally, there are no nearby agricultural sites that would be affected by development within Imperial Beach. The project would have **no impact** on agricultural or forest resources.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
3. AIR QUALITY. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

Both the U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established ambient air quality standards for common pollutants. Ambient air quality standards are set to protect public health and are levels of pollutants which represent safe levels that avoid specific adverse health effects. The ambient air quality standards cover what are called “criteria” pollutants because the health and other effects of each pollutant are described in criteria documents. The major criteria pollutants are ozone, carbon monoxide, nitrogen dioxide, and particulate matter. Both federal and state ambient air quality standards apply, as established by the U.S. Environmental Protection Agency (USEPA) and state air quality agencies (CALEPA for California). California air quality standards are generally more stringent than federal standards.

The City of Imperial Beach is located in the San Diego Air Basin (SDAB). In San Diego County, the San Diego Air Pollution Control District (SDAPCD) is the agency responsible for protecting the public health and welfare through the administration of federal and state air quality laws and policies. This regional agency regulates air quality through its permit authority over most types of stationary emission sources and through its planning and review process.

Attainment Designations

Specific geographic areas that do not meet federal air quality standards (National Ambient Air Quality Standards [NAAQS]) or state air quality standards (California Ambient Air Quality Standards [CAAQS]) for a particular air quality pollutant are considered to be “nonattainment” areas for the pollutant. The current federal and state attainment status for the SDAB is provided in **Table 6, Federal and State Air Quality Designations in the San Diego Air Basin**.

Table 6
Federal and State Air Quality Designations in the San Diego Air Basin

Criteria Pollutant	Federal Designation	State Designation
Ozone (O ₃) (8-hour)	Nonattainment	Nonattainment
Ozone (O ₃) (1-hour)	Attainment ¹	Nonattainment
Carbon Monoxide (CO)	Attainment	Attainment
Respirable Particulate Matter (PM ₁₀)	Unclassifiable ²	Nonattainment
Fine Particulate Matter (PM _{2.5})	Attainment	Nonattainment
Nitrogen Dioxide (NO ₂)	Attainment	Attainment
Sulfur Dioxide (SO ₂)	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	No Standard	Attainment
Hydrogen Sulfide	No Standard	Unclassified
Visibility	No Standard	Unclassified

¹ The federal 1-hour standard was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans.
² At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.
Source: San Diego Air Pollution Control District, Attainment Status Website <https://www.sdapcd.org/content/sdc/apcd/en/air-quality-planning/attainment-status.html>, accessed January 25, 2021.

Monitored Air Quality

Included in the SDAPCD's tasks are the monitoring of air pollution, which it does through operation of a network of ambient air monitoring stations throughout the San Diego region. The purpose of the monitoring stations is to measure ambient concentrations of criteria air pollutants and determine whether the ambient air quality meets state and federal standards, pursuant to the CAAQS and the NAAQS. The nearest ambient monitoring station to the project site is the El Cajon-Lexington Elementary School monitoring station, located at 533 First Street in El Cajon. Air quality data collected at the El Cajon-Lexington Elementary School monitoring station for the years 2017 through 2019 (the most recent year available) are shown in **Table 7, Air Quality Monitoring Data**.

Table 7
Air Quality Monitoring Data

Pollutant Standards	2017	2018	2019
Ozone (O₃)			
Maximum concentration 1-hour period (ppm)	0.96	0.087	0.094
Maximum concentration 8-hour period (ppm)	0.081	0.079	0.074
Days above 1-hour state standard (>0.09 ppm)	1	0	0
Days above 8-hour state/federal standard (>0.070 ppm)	9	2	2
Nitrogen Dioxide (NO₂)			
Maximum concentration 1-hour period (ppm)	45.0	45.0	39.0
Days above state 1-hour standard (0.18 ppm)	0	0	0
Days above federal 1-hour standard (0.100 ppm)	0	0	0
Annual average (ppm)	10	8	8
Exceed annual federal standard (0.053 ppm)	No	No	No
Exceed annual state standard (0.030 ppm)	No	No	No
Suspended Particulates (PM₁₀)			
Maximum 24-hour concentration (µg/m ³)	50.0	43.0	38.7

Table 7
Air Quality Monitoring Data

Pollutant Standards	2017	2018	2019
Measured Days above 24-hour state standard ($>50 \mu\text{g}/\text{m}^3$)	0	0	0
Measured Days above 24-hour federal standard ($>150 \mu\text{g}/\text{m}^3$)	0	0	0
Annual average ($\mu\text{g}/\text{m}^3$)	23.0	23.0	*
Exceed State annual standard ($20 \mu\text{g}/\text{m}^3$)	Yes	Yes	*
Suspended Particulates (PM_{2.5})			
Maximum 24-hour concentration ($\mu\text{g}/\text{m}^3$)	31.8	36.2	23.8
Days above 24-hour federal standard ($>35 \mu\text{g}/\text{m}^3$)	0	1	0
Annual average ($\mu\text{g}/\text{m}^3$)	9.5	9.6	8.5
Exceed state and federal annual standard ($12 \mu\text{g}/\text{m}^3$)	No	No	No
ppm = parts per million; $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter; * = insufficient data. Source: California Air Resources Board, iADAM: Air Quality Data Statistics Website, 2020.			

The SDAPCD and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for the attainment and maintenance of the CAAQS and the NAAQS in the SDAB. The SDAPCD prepared the San Diego County Regional Air Quality Strategy (RAQS), which was initially adopted in 1991, and is updated on an approximate triennial basis. The most recent version of the RAQS was adopted by the SDAPCD in December 2016 (SDAPCD 2016). The RAQS relies on information from the California Air Resources Board (CARB) and San Diego Association of Governments (SANDAG), including mobile and area source emissions, as well as information regarding projected growth in San Diego County. This information is used to project future emissions and then determine the strategies necessary for the reduction of emissions through regulatory controls. The CARB mobile source emissions projections and the SANDAG growth projections are based on population and vehicle use trends and land use plans developed by the cities and the county as part of the development of the county's and cities' general plans. As such, projects that propose development consistent with the growth anticipated by a general plan would be consistent with the RAQS.

Sensitive Receptors

CARB and the Office of Environmental Health Hazard Assessment (OEHHA) have identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved and are referred to as sensitive receptors. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers.

Regulatory Setting

Regulations exist at federal, state, and local levels with regard to air quality and include:

- a) Federal Clean Air Act
- b) California Clean Air Act
- c) State Implementation Plan
- d) California Energy Code
- e) Regional Air Quality Strategy

- f) San Diego Air Pollution Control District Rules and Regulations:
 - a) Rule 50 (Visible Emissions)
 - b) Rule 51 (Nuisance)
 - c) Rule 55 (Fugitive Dust Control)
 - d) Rule 67.0.1 (Architectural Coatings)

Checklist Discussion

a) ***No Impact.***

If a project is inconsistent with the growth assumptions of the regional air quality attainment plans, then it would conflict with, or obstruct the implementation of such plans. Projects that result in an increase in population growth, as identified in local general plans and/or community plans, would be considered inconsistent with the air quality attainment plan (AQAP). The General Plan Housing Element is a policy document that addresses the housing need in the City; no actual development or rezoning/redesignation of land is proposed as part of the Housing Element Update. Because the Housing Element Update does not change the land use designation or development assumptions of the General Plan, the proposed project remains consistent with growth projects used by the SDAPCD for its air quality attainment plan. Therefore, the project would be consistent at a sub-regional level with the RAQS and would not obstruct implementation of the RAQS. Therefore, the project will have **no impact** on implementation of the applicable air quality plan.

b), c) ***Less Than Significant Impact.***

Short-Term (Construction) Emissions

Future development consistent with the General Plan could result in an increase in criteria pollutants during construction activities, such as excavation and grading, exhaust emissions of construction equipment, and the use of typical construction materials such as asphalt and other construction materials that tend to volatilize into the atmosphere. Due to the negligible amount and short duration of these activities, all are considered to be less than significant, except the potential impacts from construction activities generating dust. Construction activities such as excavation and grading operations and construction vehicles driving over and wind blowing over exposed earth generate fugitive dust that will affect local and regional air quality. The effects of these dust generating activities will be increased dust fall and locally elevated levels of PM₁₀ downwind of construction activity. Construction dust also has the potential for creating a nuisance at nearby properties. However, any future project resulting from adoption and implementation of the Housing Element will be required to comply with SDAPCD's and Imperial Beach's regulations, which include implementation of dust control measures.

Long-Term (Operational) Emissions

Future residential development would potentially increase population in the City and add sensitive receptors that could be exposed to pollutant concentrations. The potential operational air quality impacts of future residential projects largely will be associated with motor vehicle trips generated by the proposed developments. Since most of the anticipated development sites will result in the replacement of existing development with new housing and mixed-use projects, the increase in the number of vehicle trips is not expected to be significant. The majority of the expected development sites are located along major transportation corridors with existing transit stops. This placement of development sites is intended to

encourage transit use and reduce auto dependency. Any minor increase in vehicle trips generated will only marginally increase daily emissions of ozone precursors and particulate matter (PM₁₀ and PM_{2.5}) and will likely be below SDAPCD established thresholds for consideration of a significant impact.

Conclusion

The project is the adoption of the City of Imperial Beach Housing Element 2021-2029 Update. Any individual development project will be subject to environmental review pursuant to CEQA and the City's local procedures to determine if any long-term air quality impacts will occur from the operation of a specific new development. As such, the project will not result in a cumulatively net increase of any criteria pollutant in which the project region is in nonattainment under the federal and state ambient air quality standard. Therefore, the project will have a **less than significant impact** in the region's nonattainment criteria pollutants and exposure to sensitive receptors to substantial pollutant concentrations.

d) *Less Than Significant Impact.*

Short-Term (Construction) Emissions

Future residential development construction activities could result in minor amounts of odor compounds associated with diesel heavy equipment exhaust and architectural coatings. These compounds would be emitted in various amounts at various locations during construction and potentially effect nearby sensitive receptors. However, odors are highest near the source and would quickly dissipate away from the source. Such odors are temporary and generally occur at magnitudes that would not affect a substantial number of people. Therefore, impacts related to construction-generated odors would be **less than significant**.

Long-Term (Operational) Emissions

Typical long-term operational characteristics of residential development are not associated with the creation of odors nor anticipated to generate odors affecting a substantial number of people. Implementation of the Housing Element 2021-2029 Update would result in possible construction of additional residential units. The Housing Element 2021-2029 Update would not create uses that, in the long-term operation, would be typically associated with the creation of such odors, nor are they anticipated to generate odors affecting a substantial number of people. Therefore, impacts related to odors generated from residential operations as a result of the Housing Element 2021-2029 Update would be **less than significant**.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
4. 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 Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands a (including, but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Setting²

The City of Imperial Beach can be divided into two general areas: (1) the urbanized area, and (2) undeveloped open space.

All development in the city is located within the urbanized core. As such little natural vegetation is present in the urbanized area. The domestic vegetation consists of landscaping, mainly ornamental trees, some street trees, shrubbery and a variety of ground covers. Most of the landscaping can be found on private

² The source of information in this section is the City of Imperial Beach General Plan/Local Coastal Program, 2019.

property. Landscaping on city streets, school grounds and playgrounds is conspicuously lacking which is most evident along major streets, in the commercial areas and in the beach area. Similarly, existing significant wildlife habitats within the developed urban area of the City are nonexistent. The types of wildlife that do exist are those that have adapted to, or are compatible with, urbanization and do not have to compete with man for survival.

Undeveloped Open Space is the largest land use designation in the city, with 39 percent of the City's acreage consisting of environmentally protected open space habitat in the Tijuana River watershed, and 14 percent consisting of "Urban Reserve," which comprises the U.S. Navy Outlying Landing Field helicopter training facility.

The City is rich in biological resources due to its unique position on the San Diego Bay, the Tijuana River Estuary, and the Pacific Ocean. In Imperial Beach, sensitive habitat areas around San Diego Bay and the Tijuana River have been preserved and protected in perpetuity since 1982 through federal and state designations including the establishment of the Tijuana River National Estuarine Research Reserve (TRNERR) and the California Marine Protected Areas at the Tijuana River Mouth State Marine Conservation Area.

Imperial Beach is bordered to 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) and includes the tidally influenced area of the Otay River. The refuge boundary preserves and protects 2,620 acres of important 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 and provides vital habitat for tens of thousands of resident and over-wintering waterfowl, seabirds, shorebirds, and an important stop on the Pacific Flyway. Major habitat restoration of the former western salt ponds started in 2010 and is ongoing.

Along the City's southern border is the Tijuana River Valley which contains one of the largest intact coastal wetland systems in Southern California. Unlike most other coastal ecosystems in the region, which have been fragmented or lost altogether, the valley has contiguous beach, dune, salt marsh, riparian, and upland ecosystems. The lower section of the Tijuana River Watershed encompasses 2,293 acres of the Tijuana River National Estuarine Research Reserve (TRNERR). The TRNERR has also been designated a "Wetland of International Importance" by the United Nation's Ramsar Convention on Wetlands since 2005.

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), that encompasses the beach (and its resources) to the Mexican border. The Southwest Wetlands Interpretive Association funds and works in collaborative partnerships with these agencies and others to work toward preserving and restoring wetlands. Approximately 928 acres of the TRNERR are located within Imperial Beach city limits.

Eight major natural habitats exist within the TRNERR. They include transition from upland to wetland, riparian salt marsh, salt panne, brackish marsh, estuarine channels and tidal creeks, intertidal flats, and dunes and beach. The estuary has been substantially altered by catastrophic events and human disturbances. However, with the exception of the brackish marsh habitat, which appears to be directly dependent on urban runoff, most of the habitats present today represent variations on what existed at the turn of the century.

Regulatory Setting

As 87% of Imperial Beach is within the boundaries of the Local Coastal Program, the Housing Element must be compatible with the General Plan and Local Coastal Program. A chief objective of the Coastal Act is the preservation, protection, and enhancement of coastal resources, including land and marine habitats and sensitive habitat areas, and water quality. The rarest and most ecologically important habitats are protected from development. Several policies contained in the Coastal Act, the Conservation Element and the General Plan/Local Coastal Program address those concerns.

Regulations exist at federal, state, and local levels with regard to biological resources and include:

- g) Federal Endangered Species Act
- h) Federal Migratory Bird Treaty Act
- i) Federal Clean Water Act
- j) California Endangered Species Act
- k) California Fish and Game Code
- l) Natural Community Conservation Planning Act
- m) *Porter-Cologne Water Quality Control Act*
- n) Imperial Beach General Plan and Local Coastal Program

Checklist Discussion***a) b) c) d) No Impact.***

The project is the adoption of the City of Imperial Beach Housing Element 2021-2029 Update. The General Plan Housing Element is a policy document that addresses the housing need in the City; no actual development or rezoning/redesignation of land is proposed as part of the Housing Element Update. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Land Use Element, the Local Coastal Program, a base designation, or any physical development standards. Therefore, no direct physical effects to biological resources will occur.

Inasmuch as the Housing Element Update could indirectly result in residential development and improvement, the project could result in increased density in residential and mixed-use areas of the City. However, the City is largely built-out and the City's General Plan Land Use Element and zoning code focuses residential growth into urbanized portions of the City. The project will not result in any changes in the land use pattern of the City. Because the areas where potential development may occur have already been disturbed through urban development and there are no habitats for listed species, no significant changes are anticipated in the diversity or number of species of plants or animals, or in the deterioration of existing wildlife habitat. No riparian habitat, wetlands, wildlife corridors or nurseries would be impacted.

Existing applicable federal, state, and/or local policies would prevent development in areas that support sensitive or special status species, federally protected wetlands, or migration corridors.

Accordingly, adoption of the Housing Element 2021-2029 Update would have **no impact** on biological resources, including candidate, sensitive, or special-status species; riparian habitat or other sensitive natural community; federally protected wetlands a (including, but not limited to marsh, vernal pool, coastal, etc.); or native resident or migratory fish or wildlife species, corridors, or nurseries.

e) No Impact.

The project is the adoption of the City of Imperial Beach Housing Element 2021-2029 Update. The General Plan Housing Element is a policy document that addresses the housing need in the City; no actual development or rezoning/redesignation of land is proposed as part of the Housing Element Update. The project does not propose any physical improvements. Any trees on potential development sites will be evaluated on a case-by-case basis. One of the goals of the City's GP/LCP is to promote the planting of trees where appropriate to increase and enhance the City's tree canopy. Therefore, the project would not conflict with tree preservation policies or ordinances and **no impact** would occur.

f) No Impact.

The City does not have a Habitat Conservation Plan nor 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, the Tijuana Estuary Tidal Restoration Program is a large, multi-phased wetland restoration program involving up to 500 acres of restoration (City of Imperial Beach 2019b). The General Plan Housing Element is a policy document that addresses the housing need in the City; no actual development or rezoning/redesignation of land is proposed as part of the Housing Element Update. As discussed above, the project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Land Use Element, Local Coastal Program, a base designation, or any physical development standards and will not result in any changes in the land use pattern of the City. The areas of the City identified for potential development sites are located within fully developed, urban settings surrounded by office, commercial, and residential land uses void of native plant or animal life and limited cover and foraging habitat and the project would not significantly impact biological resources. Therefore, the 2021-2029 Housing Element Update would not conflict with the provisions of the Comprehensive Management Plan and/or the planned Tijuana Estuary Tidal Restoration Program. Therefore, the project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan and **no impacts** would occur.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

Previous reviews of historical records for the Imperial Beach area indicated that there are no identified historical sites of major importance. According to the General Plan/Local Coastal Program, 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.³

According to the General Plan/Local Coastal Plan, there are presently no identified significant archaeological sites in Imperial Beach. Several archaeological sites have, however, been identified. The largest archaeological site 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. In general, 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.⁴

Regulatory Setting

Regulations exist at federal, state, and local levels with regard to cultural resources and include:

- o) National Historic Preservation
- p) National Register of Historic Places
- q) Federal Native American Graves Protection and Repatriation Act

³ City of Imperial Beach General Plan/Local Coastal Program, 2019

⁴ City of Imperial Beach General Plan/Local Coastal Program, 2019

- r) California Register of Historic Resources
- s) CEQA Guidelines Section 15064.5
- t) California Native American Graves Protection and Repatriation Act
- u) California Public Resources Code Section 5097
- v) Assembly Bill 52
- w) Senate Bill 18
- x) Imperial Beach General Plan
- y) Imperial Beach Historic Preservation Ordinance

Checklist Discussion

a), b) No Impact.

The Housing Element is a General Plan policy document that addresses housing need in the City. The Housing Element Update does not propose or authorize any development, will not result in physical alterations or improvements, and does not propose any changes to the General Plan Land Use Element, to a base designation, or to any physical development standards. Additionally, future development will occur in urban areas that are currently developed. Moreover, as discussed above there are no existing historical or archaeological resources and therefore, any future residential or mixed-use development will have **no impact** on historical and archaeological resources.

c) Less Than Significant Impact.

The 2021-2029 Housing Element is a policy document and does not propose, permit, nor authorize any development. Future residential uses to meet the RHNA demand would be located in areas that are entirely urbanized and have experienced past grading or excavation. There are no specific development projects proposed for the project that would include excavation or grading. In the unlikely event that future development does disturb human remains, compliance with state regulations pertaining to discovery of human remains would ensue. The project will result in a **less than significant impact**.

Mitigation Measures

None required.

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

Environmental Setting

Electricity

The Project Site is located within San Diego Gas and Electric's (SDG&E) service area. SDG&E serves approximately 3.6 million people within a service area of approximately 4,100 square miles. SDG&E produces and purchases its energy from a mix of conventional and renewable generating sources. The current sources procured by SDG&E include biomass/biowaste, solar, and wind. This represents the available renewable sources of energy that would meet the Project's energy demand. Approximately 43 percent of SDG&E's 2018 electricity procurement was from renewable sources, which is greater than the 31 percent statewide percentage of electricity purchases from renewable sources during the same time period.⁵ Furthermore, this percentage exceeds the 33 percent renewable sources that SDG&E was required to achieve by 2020 under the Renewables Portfolio Standard (RPS) Enforcement Program. In addition, SDG&E delivered approximately 45 percent renewable resources to its customers in 2019, putting them within reach of the goal of the RPS Enforcement Program to use at least 50 percent of the state's energy from renewables by 2030.⁶

Natural Gas

Natural gas is provided to the Project Site by SDG&E. The purchasing and transmission of natural gas for SDG&E customers is managed by the Southern California Gas Company (SoCalGas). SoCalGas is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.6 million customers in more than 500 communities encompassing approximately 20,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border.⁷ SoCalGas receives gas supplies from several sedimentary basins in the western United States and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada as well as local California

⁵ California Energy Commission, *Utility Annual Power Content Labels for 2018, San Diego Gas & Electric*, https://www.energy.ca.gov/sites/default/files/2020-01/2018_PCL_San_Diego_Gas_and_Electric.pdf.

⁶ SDG&E, *Our Renewable Energy Goals Website*: <https://www.sdge.com/more-information/environment/about-our-initiatives/renewable-goals>.

⁷ SoCalGas, *Company Profile*, www.socalgas.com/about-us/company-info.shtml.

supplies.⁸ The traditional, southwestern United States sources of natural gas will continue to supply most of SoCalGas' natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and the use of Canadian sources provide only a small share of SoCalGas supplies due to the high cost of transport.⁹

Transportation

According to the California Energy Commission (CEC), transportation accounted for nearly 41.1 percent of California's total energy consumption in 2017.¹⁰ Petroleum-based fuels currently account for 90 percent of California's transportation energy sources.¹¹ However, the state is now working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT. Accordingly, gasoline consumption in California has declined.¹² The CEC predicts that the demand for gasoline will continue to decline over the next ten years, and there will be an increase in the use of alternative fuels.¹³ Revisions to EPA fuel economy testing methods in 2006 as well as to manufacturing calculations in 2017 have also resulted in improved fuel efficiency of gasoline- and diesel-powered vehicles, resulting in a reduction of fuel consumption. According to fuel sales data from the California Energy Commission, fuel consumption in San Diego County was approximately 1.33 billion gallons of gasoline and 234 million gallons of diesel fuel in 2019.¹⁴

Regulatory Setting

Regulations exist at federal, state, and regional levels with regard to energy and include:

- a) Federal Corporate Average Fuel Economy (CAFE) Standards
- b) Federal Energy Independence and Security Act
- c) California Building Energy Efficiency Standards (Title 24, Part 6)
- d) California Green Building Standards (Title 24, Part 11)
- e) California's Renewable Portfolio Standard
- f) Senate Bill 350
- g) Senate Bill 100
- h) Assembly Bill 32 (California Global Warming Solutions Act of 2006) and Senate Bill 32
- i) Assembly Bill 1493 (Pavley I)
- j) Executive Order S-1-07 (California Low Carbon Fuel Standard)
- k) California Air Resources Board:
- l) Advanced Clean Car Regulation

⁸ *California Gas and Electric Utilities, 2020 California Gas Report, page 111.*

⁹ *California Gas and Electric Utilities, 2020 California Gas Report, pages 111 through 112.*

¹⁰ *California Energy Commission, 2019 Integrated Energy Policy Report, adopted February 20, 2020.*

¹¹ *California Energy Commission, 2016-2017 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program, March 2016.*

¹² *State Board of Equalization, Economic Perspective, Discussion of Recent Economic Developments, Publication 329, Volume XIX, Number 1, February 2013.*

¹³ *California Energy Commission, 2015 Integrated Energy Policy Report.*

¹⁴ *California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2019. Diesel is adjusted to account for retail (47%) and non-retail (53%) diesel sales.*

- m) Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
- n) Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen, and other Criteria Pollutants from In-Use Heavy-Duty Diesel-Fueled Vehicles
- o) Sustainable Communities Strategy (SB 375)
- p) Assembly Bill 758
- q) Senate Bill 1389
- r) California Environmental Quality Act
- s) San Diego Association of Governments Regional Transportation Plan

Checklist Discussion

a), b) *Less Than Significant Impact.*

The project is the adoption of the City of Imperial Beach Housing Element 2021-2029 Update. The General Plan Housing Element is a policy document that addresses the housing need in the City; no actual development or rezoning/redesignation of land is proposed as part of the Housing Element Update. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Land Use Element, to a base designation, or to any physical development standards. Therefore, no direct consumption of energy will occur. Inasmuch as Housing Element Update could indirectly result in residential development and improvement, such development would be infill development on sites that currently consume energy. In general, infill and redevelopment results in more efficient consumption of electrical and natural gas energy as new structures would be constructed in accordance with current energy regulations, such as Title 24 standards and applicable CALGreen requirements which are stricter than previous, earlier regulations.

The City recently adopted a Green Building Code, which introduces sustainable construction practices in planning, design, energy, resource and water efficiency, material conservation and environmental quality. Furthermore, the City allows mixed-use development in commercial zones and within residential zones with the Mixed Use Overlay districts. Policies and programs of this Housing Element will encourage and facilitate the redevelopment of underutilized commercial sites within the City's primary transit corridors. Mixed-use residential development that is both pedestrian- and transit-oriented conserves energy by reducing the number of vehicular trips and efficient use of land and construction materials.

Furthermore, in accordance with state, regional, and local plans and policies, identified development sites are located in close proximity to transit, which reduces vehicle miles traveled resulting in a reduction in the consumption of petroleum-based fuels. Therefore, future development would not be expected to consume energy in wasteful, inefficient, or unnecessary way. As such, adoption of the Housing Element 2021-2029 Update would not conflict with or obstruct plans for renewable energy or energy efficiency. Accordingly, impacts would be **less than significant**.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
7. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Setting

Faulting and Seismicity

Imperial Beach is located in San Diego County, a seismically active region subject to moderate to severe ground shaking in the event of a major earthquake along any of the active faults in the region. The Safety Element of the General Plan/Local Coastal Program identifies three major regional zones of faulting within the San Diego Region: (1) The San Jacinto Fault Zone, located in the eastern part of the County, is considered to be a major active branch of the San Andreas fault system; (2) The Elsinore fault zone

paralleling the San Jacinto fault zone is the largest known active fault in the County of San Diego. (3) The Rose Canyon fault zone, paralleling the Pacific coastline, is considered to be the possible southeasterly extension of the Newport-Inglewood fault zone. However, no fault rupture hazard zones as designated by the Alquist-Priolo Act are located within the City. The La Nacion Fault is the closest to the City of Imperial Beach, located about 2 miles east.¹⁵

Soil Conditions

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. The Soils Map, Figure S-3 in the Safety Element of the General Plan identifies the different soils and their location in the different areas of the City. The soils in the developed areas of the City where future development would occur include is defined as Urban Land. A small corner of the developed portion of the City, north of Imperial Beach Boulevard to the northern border of the City and west of 3rd Street to the Ocean is characterized by Marine Loamy Coarse soils. are located in the northwest corner of the City and along the coast.

Paleontological Resources

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.

Regulatory Setting

Regulations exist at state and local levels with regard to geology and soils and include:

- t) California Alquist-Priolo Earthquake Fault Zoning Act
- u) California Seismic Hazards Mapping Act
- v) California Building Code
- w) Imperial Beach Building Code
- x) Imperial Beach General Plan Safety Element

Checklist Discussion

a.i-ii) *Less Than Significant Impact.*

The project is the adoption of the City of Imperial Beach Housing Element 2021-2029 Update. The General Plan Housing Element is a policy document that addresses the housing need in the City; no actual

¹⁵ California Geological Survey, EQ Zapp: California Earthquake Hazards Zone Application, Earthquake Zones of Required Investigation Interactive Map, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.

development or rezoning/redesignation of land is proposed as part of the Housing Element Update. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Land Use Element, to a base designation, or to any physical development standards.

Indirect impacts could occur through potential future development. The Housing Element Update includes an inventory of sites that are adequate to accommodate the City's assigned share of regional housing need, but it does not propose development projects. As the areas of the City zoned for residential or commercial land use are essentially built-out, all future development will be infill and/or replacement of existing uses.

As southern California is seismically active, potential impacts associated with seismic hazards, including rupture of a fault, strong seismic shaking and seismic-related ground failure currently exist. Most of the developed areas 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. As future development would only occur on sites currently or previously developed, impacts resulting from potential construction would be the same as under current conditions.

The General Plan addresses geology and soils in the Safety Element, and the City has adopted the California Building Code that includes provisions for construction in seismically active areas, and on different types of soils. Adherence to regulatory codes, such as Uniform Building Code (UBC) and California Building Code (CBC), would ensure that all new development would be built to adequately withstand strong seismic ground shaking through proper engineering and design. Depending on location and scope, may be required to prepare geologic reports to address potential geologic impacts associated with the development of the site. The City ensures compliance with development requirements at the time of building permits are issued.

Neither adoption of the Housing Element update nor any future development within the urban/developed core would result in potential impacts associated with seismic hazards that don't currently exist. Therefore, impacts related to geology and soil, such as faulting, groundshaking, and soil instability would be would be **less than significant**.

a.iii) *Less than Significant Impact.*

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. Although the Housing Element itself does not propose, permit nor authorize any development, meeting the required housing needs will require future development. Adherence to regulatory codes, such as UBC and CBC, would ensure new structures 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) *No Impact.*

The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Land Use Element, to a base designation, or to any physical development standards.

The terrain of Imperial Beach is generally flat and the potential for landslides to occur is low. Although there are small cliffs within Border Field State Park and at the south end of Seacoast Drive (Safety Element 2018), no development is or would be permitted in this area. Though landslides in the urban area are unlikely, future development in the City would be required to adhere to all applicable UBC and CBC standards therefore, therefore there would be **no impact**.

b) *No Impact.*

The proposed project is the adoption of the Housing Element update which in and of itself does not promote, permit nor authorize any future development. Moreover, soil erosion or loss of topsoil would generally not occur as the City is primarily built out. 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. Additionally, all future development will be required to implement Best Management Practices (BMPs) for construction activities as specified by the California Storm Water Best Management Practices Handbook and/or the City's Storm Water BMP Manual. The BMPs include measures guiding the management and operation of construction sites to control and minimize the volume of surface runoff. These measures address procedures for controlling erosion and sedimentation and managing all aspects of the construction process. All development projects must comply with all City, state, and federal standards pertaining to stormwater run-off and erosion. As such, there would be **no impact** related to erosion.

c), d) *No Impact.*

The project is the adoption of the City of Imperial Beach Housing Element 2021-2029 Update. The General Plan Housing Element is a policy document that addresses the housing need in the City; no actual development is proposed as part of the Housing Element Update. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Land Use Element, to a base designation, or to any physical development standards. New developments would be located on sites that have already been developed. It is unlikely that a new structure on a previously or currently occupied site designated for urban use would experience unstable conditions that were not previously encountered. Future risks would be similar those that currently exist.

The Safety Element Policy S-1 states that no development should proceed until geo-technical investigations and recommendations are completed concerning potential soils, geologic, seismic and/or flood hazards and to determine which land uses (if any) are appropriate for the site, and to determine what measures could be undertaken to reduce risks to life and property. Proper engineering and adherence to required building standards, such as the UBC and CBC should ensure there will be **no impact**.

e) *No Impact.*

The opportunity sites identified for potential future development supported by the Housing Element are all located within urban sites within the City. The City, including the opportunity sites are served by existing sewer infrastructure. No septic tanks would be required and **no impact** would occur.

f) *No Impact.*

As previously stated, the General Plan Housing Element is a policy document that addresses housing need in the City; no actual development or rezoning/redesignation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, impact paleontological resources. Future development would be constructed on infill sites or other sites that are currently occupied with structures and have previously been graded. Although future development will not likely disturb paleontological resources, geotechnical evaluations should be conducted if redevelopment or construction could require deeper excavation than current conditions. (Safety Element Policy S-1, Imperial Beach GP/LCP 2019) could be undertaken to reduce risks to life and property. The project will have **no impact**.

Mitigation Measures

None required.

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

Environmental Setting

Global temperatures are moderated by naturally occurring atmospheric gases. These gases are commonly referred to as greenhouse gases (GHGs) because they function like a greenhouse, allowing solar radiation (sunlight) into the Earth's atmosphere but prevent heat from escaping, thus warming the Earth's atmosphere. GHGs, as defined under California's Assembly Bill (AB) 32, include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). GHGs are emitted by natural processes and human (anthropogenic) activities. Anthropogenic GHG emissions are primarily associated with (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activity; and (4) solid waste decomposition. GHG emissions from human activities are the most significant driver of observed climate change since the mid-20th century.¹⁶ Global climate change refers to changes in average climatic conditions over the entire Earth, including temperature, wind patterns, precipitation, and storms.

A San Diego regional emissions inventory that was prepared by the University of San Diego School of Law, Energy Policy Initiative Center (EPIC) accounted for the unique characteristics of the region. Its 2014 emissions inventory update for San Diego is presented in **Table 8, San Diego County GHG Emissions by Sector in 2014**.

Table 8
San Diego County GHG Emissions by Sector in 2014

Sector	2014 Emissions MMT CO _{2e} (% total) ¹
On-Road Transportation	1.45 (45%)
Electricity	0.76 (24%)
Solid Waste	0.34 (11%)
Natural Gas Consumption	0.29 (9%)
Agriculture	0.16 (5%)
Water	0.13 (4%)

¹⁶ United Nations Intergovernmental Panel on Climate Change, *Climate Change 2013: The Physical Science Basis, Working Group I Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, 2013*.

Table 8
San Diego County GHG Emissions by Sector in 2014

Sector	2014 Emissions MMT CO_{2e} (% total) ¹
Off-Road Transportation	0.04 (1%)
Wastewater	0.02 (1%)
Propane	0.01 (<0.5%)
Total	3.21
¹ Percentages may not total 100 due to rounding. Source: University of San Diego School of Law, Energy Policy Initiative Center, County of San Diego 2014 Greenhouse Gas Inventory and Projections, 2017.	

Regulatory Setting

Regulations exist at federal, state, regional, and local levels with regard to GHGs and include:

- Federal Clean Air Act
- Light Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards
- California Code of Regulations, Title 24, Part 6
- California Green Building Standards Code
- Executive Order S-3-05
- Assembly Bill 32 – Global Warming Solution Act of 2006
- Senate Bill 375
- Senate Bill 743
- Senate Bill 97
- Executive Order B-30-15
- Senate Bill 32 and Assembly Bill 197
- Assembly Bill 1493 – Vehicular Emissions of Greenhouse Gases
- Assembly Bill 341
- Executive Order S-01-07
- Senate Bill 350
- Senate Bill 100
- California Air Resources Board: Scoping Plan
- SANDAG's San Diego Forward: The Regional Plan
- City of Imperial Beach Climate Action Plan

Checklist Discussion

a), b) *Less Than Significant Impact.*

The project is the adoption of the City of Imperial Beach Housing Element 2021-2029 Update. The General Plan Housing Element is a policy document that addresses the housing need in the City; no actual development or rezoning/redesignation of land is proposed as part of the Housing Element Update. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Land Use Element, to a base designation, or to any physical development standards. The Housing Element Update includes an inventory of sites that are adequate to accommodate the City's assigned share of regional housing need, but it does not propose development projects. Inasmuch as

Housing Element Update could indirectly result in residential development and improvement, the project could result in GHG emissions from construction activities, increased vehicle use, energy consumption, natural gas combustion, water usage (i.e., water transport energy consumption), and other building sources. Such emissions would incrementally contribute to the global GHG levels.

The Imperial Beach Climate Action Plan (CAP) 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. 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 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.

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 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).

However, the City's CAP identifies achievable, measurable strategies and actions for the City to implement to reduce emissions to 15 percent below 2010 levels by 2020 and 53 percent below 2010 levels by 2035. These CAP reduction goals were designed to enable the City to meet the 2020 GHG reduction mandates of AB 32, the 2030 GHG reduction mandates SB 32, and to be on-track to meet the 2050 of EO-S-3-05 goal of GHG emissions 80 percent below 1990 levels by 2050. The CAP contains reduction measures within the City's direct influence to achieve the City's 2020 and 2035 GHG reduction targets in five strategy areas: energy; transportation and land use; water; solid waste; and green infrastructure and are intended to

reduce GHG emissions from the business as usual scenario. In accordance with the CAP and state and regional policies, future housing growth will be focused within transit opportunities areas. Thus, through implementation of the CAP, future growth in Imperial Beach is expected to result in lower emissions than existing residential uses in the City. In addition, adherence to California Green Building Code requirements will result in lower emissions from future residential buildings due to more stringent requirements for energy efficiency.

Accordingly, future residential development supported by the Housing Element Update will be required to implement policies and programs that reduce GHG emissions through more energy efficient residential buildings sited proximate to transit opportunities. Therefore, the project will not generate significant greenhouse gas emissions or conflict with greenhouse gas plans and impacts would be **less than significant**.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles or a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

Hazardous Materials

Hazardous materials encompass a wide range of substances, some of which are naturally occurring and some of which are man-made. Examples of hazardous materials include pesticides, herbicides, petroleum products, metals (e.g., lead, mercury, arsenic), asbestos, and chemical compounds used in manufacturing. Hazardous materials are used for a variety of purposes, including service industries, various small businesses, medical uses, schools, and households. Many chemicals used in household cleaning, construction, dry cleaning, film processing, landscaping, and automotive maintenance and repair are considered hazardous. Small-quantity hazardous waste generators include facilities such as automotive

repair, dry cleaners, and medical offices. Hazardous materials could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed.

Other Hazards

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.

According to the San Diego County Online Wildfire Hazard Map, the City of Imperial Beach is not located within a Fire Hazard Severity Zone. Furthermore, the City is a built-out, urban environment that does not contain wildlands and is not located adjacent to any undeveloped wildlands.

Regulatory Setting

Regulations exist at federal, state, and local levels with regard to hazards and hazardous materials and include:

- Comprehensive Environmental Response, Compensation, and Liability Act
- Resources Conservation and Recovery Act
- Hazardous Materials Transportation Act
- Federal Aviation Regulations Part 77
- California Code of Regulations
- Hazardous Materials Release Response Plans and inventory Act
- Emergency Response to Hazardous Materials Incidents
- California Government Code Section 65962.5
- Emergency Response to Hazardous Materials Incidents
- San Diego County Multi-Jurisdictional Hazard Mitigation Plan
- San Diego County Regional Airport Authority
- San Diego County Site Assessment and Mitigation Program
- City of Imperial Beach Fire Code

Checklist Discussion

a), b), c), d) *Less Than Significant Impact.*

The project is the adoption of the City of Imperial Beach Housing Element 2021-2029 Update. The Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels and does not include specific development proposals or development entitlements. However, future development of residential units constructed consistent with the General Plan could create a significant hazard to future residents through the exposure to the routine transport, use, or disposal of hazardous materials into the environment; through the exposure to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; through the exposure of handling or emission of hazardous materials, or by locating residential development on a site included on a list pursuant to Government Code Section 65962.5.

The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Land Use Element, to a base designation, or to any physical development standards. The Housing Element Update includes an inventory of sites that are adequate to accommodate the City's assigned share of regional housing need, but it does not propose development projects.

Additionally, the Housing Element in large measure does not proposed changes to the City's adopted housing- policies and programs including those set forth in the General Plan (2013) and the 2013-2021 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2013-2021 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the 2021-2029 Housing Element Update would not create new impacts or increase the significance of impacts identified in the General Plan EIR (for Hazardous Materials).

Inasmuch as the Housing Element Update could indirectly result in residential development and improvement, each potential development site will be evaluated at the time of development proposal in accordance with the requirements of CEQA. Due to the fact that hazardous substances have properties that, above certain thresholds, are toxic to humans and/or the ecosystem, multiple regulatory programs in place are designed to minimize the chance for unintended releases and/or exposures to occur. The City of Imperial Beach and other state and local agencies, such as the Department of Toxic Substances Control and San Diego County Environmental Health and Quality Department (Hazardous Materials Division), regulate hazardous materials in coordination with one another. The County enforces Title 26, Division 6, *California Highway Patrol*, of the California Code of Regulations (CCR) to reduce impacts associated with accidental release from the transportation of hazardous materials on roads in the County, and the potential for an increased demand for incident emergency response. Moreover, the San Diego County Environmental Health and Quality Department enforces workplace regulations that are applicable to businesses and public facilities addressing the use, storage, and disposal of flammable and hazardous materials pursuant to Title 8, *California Occupational Safety and Health Regulations (Cal/OSHA)*, of the CCR. Additionally, the San Diego County Environmental Health and Quality Department also enforces leak prevention measures for underground storage tanks.

Other programs establish remediation requirements for sites where contamination has occurred. If development sites are determined to contain contaminants, proper remediation will be required in accordance with these regulatory programs. Furthermore, the types of hazardous materials used, stored, and generated by residential uses consist of typical household cleaners, solvents, and fuel waste oils, etc., which are well regulated by federal and state laws. Therefore, adoption of the Housing Element 2021-2029 Update would not create a significant hazard to the public or the environment with regard to the handling, use, storage, release, or emissions of hazardous materials, including in proximity to schools. Accordingly, impacts related to hazardous materials would be **less than significant**.

e) *Less Than Significant Impact.*

The Naval Outlying Landing Field, locally referred to as Ream Field is located south of existing development within the City and is primarily used for helicopter activity. 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. Additionally, impacts related to airport safety hazards and excessive noise

potentially resulting from future development supported by the Housing Element would be **less than significant**.

f) *Less than Significant Impact.*

The City currently has an Emergency Operations Plan. Future construction and development activities that may indirectly occur as a result of the project, will be performed consistent with City engineering and fire safety standards, and are not expected to physically interfere with the Emergency Operations Plan. Therefore, there would be no impact. Potential future residential and/or mixed-use development supported by the Housing Element would not interfere with adopted emergency response or evacuation plan because such projects are not anticipated to alter street locations or access. All new development in the city is required to comply with existing fire codes and ordinances regarding emergency access, such as widths, surfaces, vertical clearance, brush clearance, and allowable grades. Adoption of the Housing Element 2021-2029 Update would not impede or conflict with any adopted emergency response or evacuation plans. Therefore, the project would have a **less than significant impact** on emergency response or evacuation plans.

g) *Less than Significant Impact.*

According to the San Diego County Online Wildfire Hazard Map, the City of Imperial Beach is not located within a Fire Hazard Severity Zone. Furthermore, the City is a built-out, urban environment that does not contain wildlands and is not located adjacent to any undeveloped wildlands. As such, no portions of Imperial Beach are located near areas subject to wildfires and the identified potential development sites are all located within developed, urban areas that do not have an urban/wildland interface. Therefore, **no impacts** related to wildfire would occur as a result of future development supported by the Housing Element.

Mitigation Measures

None required.

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

Environmental Setting

Groundwater

Imperial Beach lies within the Coastal Plain of the San Diego groundwater basin. Because of the presence of the estuary and lands that are periodically inundated, the groundwater level in Imperial Beach is relatively high, less than 25 feet in the urban areas of the City, and as close as eight feet to the surface at Ninth Street and Imperial Beach Boulevard.

The presence of shallow groundwater, in conjunction with other soil parameters, can be of great consequence in terms of ground stability during an earthquake i.e., liquefaction. The largest area subject to this hazard is around the margin of the San Diego Bay.

Because of the presence of the estuary and lands that are periodically inundated, the groundwater level in Imperial Beach is relatively high, less than 25 feet in the urban areas of the City, and as close as eight feet to the surface at Ninth Street and Imperial Beach Boulevard.

The presence of shallow groundwater, in conjunction with other soil parameters, can be of great consequence in terms of ground stability during an earthquake i.e., liquefaction. The largest area subject to this hazard is around the margin of the San Diego Bay. 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.

Beneficial uses for groundwater in the City include municipal and domestic supply; agricultural; and industrial service supply. However, the water quality of groundwater in Imperial Beach is limited and is often of poor quality because groundwater in the San Diego region is often impaired by nitrate, sulfate, total dissolved solids, inorganics, radiologicals, pesticides, and volatile organic compounds. Additionally, Tijuana is a constant source of pollution.

Surface Water

Imperial Beach is surrounded on three sides by water, the Pacific Ocean to the west, San Diego Bay to the north and the Tijuana River Estuary to the south.

Flooding

The Tijuana River Valley is subject to floods of great magnitude since it is the drainage way for the largest of the watershed basins in San Diego County. This drainage basin covers 1,700 square miles, only 27 percent of which lies within the United States. The River crosses the border at a point five miles inland from the Pacific Ocean and flows through the fertile Tijuana River Valley. This valley area is predominantly agricultural and open space. At the point where the river approaches the Imperial Beach City limits, it turns into an estuary. Most of the identified 100-year floodplain encompasses the estuary. This area has been designated as open space, due in part to its location in a flood plain, and in part to the natural habitat of the area. None of the parcels identified in the residential sites inventory are located within a floodplain.

Regulatory Setting

Regulations exist at federal, state, regional, and local levels with regard to hydrology and water quality and include:

- Clean Water Act/National Pollutant Discharge Elimination System Requirements
- National Flood Insurance Program
- NPDES Construction General Permit
- NPDES Groundwater Permit
- NPDES Municipal Permit
- Porter-Cologne Water Quality Control Act
- Water Quality Control Plan for the San Diego Basin
- City of Imperial Beach Storm Water BMP Manual
- City of Imperial Beach Watercourse Protection, Storm Water Management, and Discharge Control Ordinance

Checklist Discussion**a) *Less Than Significant Impact.***

The General Plan Housing Element is a policy document that addresses the housing need in the City; no actual development or rezoning/redesignation of land is proposed as part of the Housing Element Update. The Housing Element Update includes an inventory of sites that are adequate to accommodate the City's assigned share of regional housing need, but it does not propose development projects.

Future development would continue to be subject to the City's environmental review process. Although development consistent with the Housing Element and the GP/LCP 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.

Future residential development will either be through replacement, infill or upgrade, no new areas will be developed. The Housing Element is consistent with the General Plan and the Zoning Ordinance and does not propose any physical changes, nor policy changes. The federal Clean Water Act and California's Porter-Cologne Water Quality Control Act are the primary laws related to water quality. Regulations set forth by the U.S. EPA and the State Water Resources Control Board have been developed to fulfill the requirements of this legislation. U.S. EPA's regulations include the National Pollutant Discharge Elimination System (NPDES) permit program, which controls sources that discharge pollutants into waters of the United States (e.g., streams, lakes, bays, etc.). These regulations are implemented at the regional level by water quality control boards, which for the Imperial Beach area is the San Diego Regional Water Quality Control Board (RWQCB).

Proposed projects are required to comply with the City's NPDES permit and local policies and ordinances regarding urban runoff and water quality. In practical terms, the requirements seek to reduce water pollution by both reducing the volume of stormwater runoff and the amount of pollutants that are contained within the runoff. The methods used to achieve these objectives vary from site to site, but can include measures such as a reduction in impervious surfaces, onsite detention facilities, biofiltration swales, settlement/debris basins, etc. Therefore, future development supported by the Housing Element would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. As such, impacts would be **less than significant**.

b) *Less Than Significant Impact.*

As discussed above, Imperial Beach lies within the San Diego Coastal Plain groundwater basin. The groundwater levels in Imperial Beach are currently very high and the City is not dependent on groundwater. Furthermore, as the City is largely build-out, future residential development would not be expected to increase impervious surface area overall, and substantial changes to groundwater infiltration would not occur. Any future site plans would be reviewed by the City to include site-specific design measures that would allow for infiltration as part of erosion and runoff prevention. Future development projects would not contribute to the depletion of groundwater supplies and would not substantially interfere with groundwater recharge. Therefore, this impact would be **less than significant**.

c) i), ii), iii), iv) *Less Than Significant Impact.*

The General Plan Housing Element is a policy document that addresses the housing need in the City; no actual development or rezoning/redesignation of land is proposed as part of the Housing Element Update. The Housing Element Update includes an inventory of sites that are adequate to accommodate the City's assigned share of regional housing need, but it does not propose development projects. As all of the sites will be infill or replacement, it is not likely that any future grading and vegetation removal would could expose soil to erosion during construction activities.

Additionally, the Housing Element in large measure does not proposed changes to the City's adopted housing-relate policies and programs including those set forth in the General Plan (2013) and the 2013-2021 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2013-2021 Housing Element. Moreover, the new policies and programs that are proposed would not create any potential effect on the environment. Therefore, adopting the 2021-2029 Housing Element Update would not result in new impacts.

All future development will be required to comply with codes that address stormwater runoff control. New housing projects will be required to adhere to water quality and runoff regulations including those set forth by the National Pollution Discharge Elimination System (NPDES) Construction General Permit and the City's Stormwater Management and Discharge Control Ordinance. As such, development projects are required to implement Best Management Practices (BMPs) for construction activities as specified by the California Storm Water Best Management Practices Handbook, and/or the City's Minimum Best Management Practices (Section 7.18.140 of the Imperial Beach Municipal Code) and Storm Water BMP Manual. The BMPs include measures guiding the management and operation of construction sites to control and minimize the potential contribution of pollutants to storm runoff from these areas. These measures address procedures for controlling erosion and sedimentation and managing all aspects of the construction process to ensure control of potential water pollution sources. All development projects must comply with all City, state, and federal standards pertaining to stormwater run-off and erosion.

In addition, given that the City is primarily build-out, future residential development would not be expected to result in increased in impervious surface area, substantial changes to drainage patterns, or changes to groundwater infiltration. Accordingly, impacts related to the alteration of drainage patterns would be **less than significant**.

d) *Less than Significant Impact.*

Although much of the City is within a 100-year flood zone, it is the open space areas that would be impacted. Flooding would occur primarily in the low lying tidal lands surrounding the developed core. (<https://myhazards.caloes.ca.gov>). Although the project site is within a Tsunami Hazard Area, no Tsunamis have ever hit the San Diego area. There have only been three to hit California since 1812. Furthermore, the Project is a policy document and does not propose any development nor changes to any existing land use designations. Impacts from adoption of the Housing Element in terms of floods or tsunamis will remain the same as under current conditions and therefore the impact would be **less than significant**.

e) *Less Than Significant Impact.*

The project is the adoption of the City of Imperial Beach Housing Element 2021-2029 Update. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Land Use Element, to a base designation, or to any physical development standards. The Housing Element Update includes an inventory of sites that are adequate to accommodate the City's assigned share of regional housing need, but it does not propose development projects. Inasmuch as Housing Element Update could indirectly result in residential development and improvement, such development would be subject to regulations and policies specifically designed to prevent surface and groundwater water quality and hydrology effects as well as prevent flooding. Therefore, future development supported by the Housing Element would not conflict with water quality or groundwater management plans and impacts related to hydrology and water quality would be **less than significant**.

Mitigation Measures

None required.

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

Environmental Setting

The City of Imperial Beach can be divided into two general areas: (1) the urbanized area, and (2) undeveloped open space. Development is concentrated in the northern part of the City and the urbanized area is essentially built-out with very few vacant lots. There is very clear delineation between the different uses. All development in the city is located within the urbanized core within established neighborhoods.

The two primary land use types are residential and commercial. The commercial is primarily community or visitor serving with recent mixed use developments. There are no industrial uses in the City.

Regulatory Setting

Regulations exist at state and local levels with regard to land use and include:

- California Planning and Zoning Law, Government Code Sections 65000 et seq.
- SANDAG's Regional Comprehensive Plan
- SANDAG's 2050 Regional Transportation Plan/Sustainable Communities Strategy
- San Diego Regional Air Quality Strategy
- City of Imperial Beach General Plan
- City of Imperial Beach Zoning Ordinance
- City of Imperial Beach Subdivision Ordinance
- City of Imperial Beach urban Design Program

Checklist Discussion

a) **No Impact.**

The project is the adoption of the City of Imperial Beach Housing Element 2021-2029 Update. The project will not result in the approval of any physical improvements or development projects. The Housing Element policies guide housing, emphasizing provision of affordable housing and a range of housing types and locations. The Housing Element would not rezone or change the land use designations established by the Land Use Element of the General Plan. The Housing Element Update includes an inventory of sites that are adequate to accommodate the City's assigned share of regional housing need, but it does not propose development projects. Future residential development will be primarily infill both through redevelopment of an existing site or the development of higher density mixed use projects. All future development will go

through the design review and site plan review processes to ensure any new structure is harmonious with existing uses. As such, adoption of the Housing Element 2021-2029 Update would not physically divide an established community and **no impact** would occur.

b) *Less Than Significant Impact.*

The project is the adoption of the City of Imperial Beach Housing Element 2021-2029 Update. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Land Use Element, to a base designation, or to any physical development standards. As the Housing Element is a mandatory element of the General Plan and Local Coastal Program, it must be consistent with them. The Housing Element Update includes an inventory of sites that are adequate to accommodate the City's assigned share of regional housing need, but it does not propose development projects. Inasmuch as Housing Element Update could indirectly result in residential development and improvement, the project could result in increased density in residential and mixed-use areas of the City in an effort to meet their RHNA allotment. The zoning established for these areas provides development standards intended to provide for new development to have similar characteristics (such as mass, bulk, height, and density) as the surrounding areas. Future development will occur on sites already zoned for housing and will follow the City's standard procedures for review, including public notice, environmental review, and consideration of design and neighborhood context. The identified opportunity sites could be developed in the future with or without the Housing Element Update. New residential development would be required to comply with all applicable plans and regulations including the General Plan and the City's Municipal Code. All development projects are subject to environmental review as appropriate in compliance with CEQA prior to approval. Project and site-specific concerns will be evaluated and addressed as development projects for specific sites are proposed. As such, impacts related to conflicts with land use plans, policies, and regulations would be **less than significant**.

Mitigation Measures

None required.

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

Regulations and responsible agencies exist at the state level with regard to mineral resources and include:

- Surface Mining and Reclamation Act of 1975
- Division of Oil, Gas, and Geothermal Resources
- Division of Mines and Geology

Checklist Discussion

a), b) No Impact.

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.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
13. 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 in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Noise Fundamentals

Sound is described in terms of amplitude (i.e., loudness) and frequency (i.e., pitch). The standard unit of sound amplitude measurement is the decibel (dB). The dB scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted dB scale (dBA) provides this compensation by emphasizing frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound audible at such a level that the sound becomes an undesirable by-product of society's normal day-to-day activities. Sound becomes unwanted when it interferes with normal activities, causes actual physical harm, or results in adverse health effects. The effects of noise on people can be placed into four general categories:

- Subjective effects (e.g., dissatisfaction, annoyance);
- Interference effects (e.g., communication, sleep, and learning interference);
- Physiological effects (e.g., startle response); and
- Physical effects (e.g., hearing loss).

The definition of noise as unwanted sound implies that it has an adverse effect, or causes a substantial annoyance, to people and their environment. However, not every unwanted audible sound interferes with normal activities, causes harm, or has adverse health effects. For unwanted audible sound (i.e., noise) to be considered adverse, it must occur with sufficient frequency and at such a level that these adverse impacts are reasonably likely to occur.

Vibration Fundamentals

Vibration can result from a source (e.g., train operations, motor vehicles, machinery equipment, etc.) causing the adjacent ground to move and creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the vibration level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

Environmental Setting

Imperial Beach has three primary sources of noise. The main source of noise consists of traffic on the City's arterial streets. A second source of noise consists of helicopter activity from Ream Field. The activity level of the helicopters varies considerably from day to day. Adverse helicopter noise impacts the South Seacoast, Tijuana Estuary, Seaside Point and Oneonta neighborhoods. The third source of noise comes from temporary construction including demolition of existing pavement, earth moving equipment and finish construction. Heavy equipment noises range from 72 to 90 dB(A) at 50 feet from the source. Many land uses are considered sensitive to noise. Noise-sensitive receptors within the City include single- and multi-family residential, schools, parks, libraries, hospitals, churches, habitat, and open space.

Regulatory Setting

Various private and public agencies have established noise guidelines and standards to protect citizens from potential hearing damage and other adverse physiological and social effects associated with noise. Federal, state, regional, and local guidelines include the following:

- Federal Transit Administration and Federal Railroad Administration Standards
- Federal Aviation Administration Standards
- California Noise Control Act
- California Code of Regulations
- City of Imperial Beach General Plan
- City of Imperial Beach Municipal Code

Checklist Discussion

a), b) *Less Than Significant Impact.*

The project is the adoption of the City of Imperial Beach Housing Element 2021-2029 Update. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Land Use Element, to a base designation, or to any physical development standards. The Housing Element Update includes an inventory of sites that are adequate to accommodate the City's assigned share of regional housing need, but it does not propose development projects. As no specific development projects are proposed by the project, no specific noise and vibration impacts can be evaluated. Indirect construction activity associated with future potential development 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.

Noise sources associated with potential future development would include those typical of suburban areas (e.g., mechanical equipment, dogs/pets, landscaping activities, weekly garbage collection, cars parking). These noise sources are typically intermittent and short in duration, and would be comparable to existing sources of noise experienced at surrounding residential uses. As most of the identified opportunity sites are located in established residential and mixed-use commercial/residential districts with existing noise sources, potential increases would be below established thresholds for consideration of a significant impact.

Temporary construction activities as a result of future development could result in excessive groundborne vibration or groundborne noise. The exact nature of potential 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. Impacts would be **less than significant**.

c) *Less Than Significant Impact.*

The project is the adoption of the City of Imperial Beach Housing Element 2021-2029 Update. The General Plan Housing Element is a policy document that addresses the housing need in the City; no actual development or rezoning/redesignation of land is proposed as part of the Housing Element Update. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Land Use Element, to a base designation, or to any physical development standards.

The maximum indoor and outdoor noise levels for residential development is 45dB and 60dB, respectively. Any future residential development within the 60dB noise contour of Ream Field must be constructed to attenuate exterior noise levels down so that interior noise levels are at 45dB. Individual development projects will be subject to environmental review pursuant to CEQA and the City's local guidelines and procedures to reduce any potential noise impacts to a level that is less than significant therefore this impact would be **less than significant**.

Mitigation Measures.

None required.

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

Environmental Setting

The population in Imperial Beach increased from 26,324 in 2010 to 28,055 in 2020 (Table 9, City of Imperial Beach Population Projections). This 6.6 percent population increase between 2010 and 2020 followed a decrease in population in the preceding decade. Between 2000 and 2010, Imperial Beach's population declined by 2.5 percent from 26,992 to 26,324. The SANDAG 2050 Regional Growth Forecast estimates that the Imperial Beach population will continue to increase and reach 30,369 by 2035.

Table 9
City of Imperial Beach Population Projections

Projection Year				Percent Change		
2000	2010	2020	2035*	2000-2010	2010-2020	2020-2035
26,992	26,324	28,055	30,369	-2.5 %	6.6 %	8.2 %
* Represents an estimate from the SANDAG 2050 Regional Growth Forecast. Sources: Bureau of the Census (2000,2010), California Department of Finance, and SANDAG Regional Growth Forecast Update (2013). City of Imperial Beach 2021-2029 Housing Element						

Table 10, City of Imperial Beach Projected Housing Units, shows that SANDAG expects the housing stock in Imperial Beach to increase by eight percent between 2020 and 2035. Between 2020 and 2050, the Imperial Beach housing stock is forecast to experience an increase of 14 percent and approximately 22 percent more units could be added in the region.

Table 10
City of Imperial Projected Housing Units

Projection Year			Percent Change	
2020	2035	2050	2020-2035	2020-2050
10,146	10,926	11,528	7.7 %	13.6 %
Sources: American Community Survey (ACS) (2014-2018) and SANDAG Regionwide Forecast (2013) City of Imperial Beach 2021-2029 Housing Element				

Regulatory Setting

Regulations and plans exist at state, regional, and local levels with regard to populations and housing and include:

- California Government Code Section 65583 and 655849(a)(1)
- Senate Bill 375
- SANDAG 2050 Regional Transportation Plan
- Regional Housing Needs Assessment

Checklist Discussion**a) *No Impact.***

The project is the adoption of the City of Imperial Beach Housing Element 2021-2029 Update. The General Plan Housing Element is a policy document that addresses the housing need in the City; no actual development or rezoning/redesignation of land is proposed as part of the Housing Element Update. The Housing Element Update contains housing goals intended to encourage housing to meet the City's housing needs. The expectation is that as growth occurs consistent with the existing General Plan, housing would be provided that serves all income levels of the city, including both moderate- and low-income residents. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Land Use Element, to a base designation, or to any physical development standards. Although the project does not propose development projects itself, it identifies opportunity sites that are adequate to accommodate up to 1,329 new housing units. Based on the 2018 persons per household rate of 2.9 (Table H-9, Housing Element) the development of 1,329 housing units would generate 3,854 new residents. The City's population in 2020 was 28,055 and SANDAG 2050 Regional Growth Forecast estimates the City to increase to 30,369 by 2035 and 77,881 by 2050 which represents a 17 percent and 29 percent increase from 2020 estimated population. Housing policies leading directly and indirectly to population growth from the Housing Element Update would be accommodated within the anticipated future population growth for the City.

Housing Element Updates are proposed to accommodate anticipated growth within a jurisdiction. The Housing Element Update demonstrates that the state-mandated share of housing for the City can be accommodated and is consistent with development levels anticipated by regional and local planning documents. The Housing Element, as a policy document accommodates rather than inducing population growth and **no impact** would occur.

b) *Less Than Significant Impact.*

The project is the adoption of the City of Imperial Beach Housing Element 2021-2029 Update. The General Plan Housing Element is a policy document that addresses the housing needs in the City. No actual development or rezoning/redesignation of land is proposed as part of the Housing Element Update. The purpose of Government Code Section 65863 (No Net Loss Law), is to ensure development opportunities remain available throughout the planning period to accommodate a jurisdiction's regional housing need allocation (RHNA), especially for lower- and moderate- income households. Implementing the Housing Element would not result in any displacement. Therefore, **no impacts** would occur.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
15. PUBLIC SERVICES. 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:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

Fire Protection

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. The engine has a 24-foot ground extension ladder, which can reach the second story of a building. Though the Fire Department does not have a Ladder Truck Company on-site, the cities of San Diego, Coronado, and Chula Vista are available to respond, via automatic aid agreements, to all structural fires and rescue emergencies.

Police Protection

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. Additionally, the Imperial Beach Station provides law enforcement services to residents who reside in the unincorporated communities of Bonita, Sunnyside, Lincoln Acres, Proctor Valley, Otay Valley, and Otay Mesa. Additional law enforcement is provided by the Sheriff's F-7 involvement program, which is a volunteer patrol program consisting of retired persons trained for community protection and patrol assignments. Activities include: daily senior citizen safety checks, vacation property checks, and an "eyes on the road" patrol program. The Sheriff's office will continue to enhance and maintain this program.

Schools

Public school education in Imperial Beach is provided by South Bay Union School District for preschool and kindergarten through sixth grade (eighth grade at a dependent charter school). Sweetwater Union High School District serves seventh through twelfth grade.

The South Bay Union School District presently has 11 elementary schools, two dependent K-8 charter schools, and one preschool within District boundaries. Four of the elementary school sites and the preschool are located within the City limits of Imperial Beach.

The Sweetwater Union High School District provides 7th through 12th grade education and Adult Education to the citizens of Imperial Beach. Two secondary schools and one adult school service the City: they are Mar Vista Academy, Mar Vista High School and Mar Vista Adult School located on the Mar Vista High School Campus. The middle school, located approximately a quarter mile outside the City's eastern boundaries (1267 Thermal, San Diego), provides 7th to 8th grade education. The high school, located at 505 Elm Street, Imperial Beach, provides 9th to 12th grade education. The Adult Schools, located at 503 Elm Street and 170 Palm Ave, provide a variety of classes including but not limited to, GED, English as a Second Language (ESL), High School Diploma Program, Business Education and Child Care classes.

The recommended standard for new elementary school sites is ten acres of land, which will provide adequate land for 18 to 20 classrooms, playgrounds and other related uses. For new junior high schools (or middle schools), 20 acres of usable land is needed for 1,500 students. High schools require 50 acres of land for 2,400 students.

State Assembly Bill (AB) 2926 authorized school districts to assess all new development a fee to offset impacts proposed projects might have on the school facilities. According to the Imperial Beach General Plan, those fees cover less one-third of the cost to provide new classrooms. Whenever possible, the Districts have requested that developers provide full impact mitigation on development. The establishment of special tax districts, full cost recovery agreements or the provision of relocatable classrooms in lieu of fees are just a few examples of such mitigation measures employed by the Sweetwater Union High School District.

At the time of the 2019 General Plan/LCP Update, the middle school and high school both exceeded their capacities. New residential development already in the City and in the Nestor and the San Ysidro communities have added students to these and neighboring schools. To meet student enrollment needs, the District plans to construct a new 2,400-student high school in Otay Mesa. In planning new schools, the Sweetwater School District uses a student generation factor of .29 students per household.

Parks

Imperial Beach's coastline, ocean, parks, and preserves define its character, contribute to a healthy environment and quality of life for residents and visitors, and support the area's economy and emerging eco-tourism sector. These resources reinforce the City's identity as a small beach-oriented town, and make the City an enjoyable, scenic and aesthetically pleasing place to live, work, play, and visit. To fully utilize the natural advantages of Imperial Beach's location and climate, a variety of park and recreational opportunities are provided for residents and visitors of all ages, incomes and lifestyles. City residents and visitors benefit from a variety of parks including mini-parks, neighborhood parks, community parks, activity centers, special use and all purpose parks. Shared or "joint use" of parks, athletic fields, open space resources and other recreational facilities is an important strategy to cost-effectively expand recreational opportunities available to the public, made possible by the City's continued Coordination with the school districts, the SDUPD, and other county, state, and federal agencies.

The City of Imperial Beach owns, operates, and/or maintains approximately 21.4 acres of park land in seven sites consisting of Sports Park, Reams Park, Dunes Park, Veterans Park, Teeple Park, Serenity Gardens Pocket Park, and Pier Plaza. The recreational programs within these parks are operated by the Imperial Beach Boys and Girls Club.

In addition to City parks, the following recreational facilities are located within the City limits: Border Field

State Park, the City Beach, the Imperial Beach Boys and Girls Club, the Mar Vista High School's athletic fields, Pier Plaza, Tijuana River Estuary Visitor Center and related trails, and the playgrounds of six elementary schools. Other recreational facilities include Marina Vista Center, the Senior Center, and the Conference Center in the Civic Center complex. Two state parks/beaches in the immediate area (Border Field State Park to the south and Silver Strand State Beach to the north) and the Tijuana River National Estuarine Research Reserve (TRNERR) also help to provide additional public recreational and beach access points and open space for City residents and visitors. The City's existing park land, including school sites, parks, and the beach but excluding the estuary and Border Field State Park, total approximately 76.9 acres. Additionally, the regional facilities within the City boundaries, Border Field State Park (317 acres) and the Tijuana River National Estuarine Research Reserve (611 acres outside of Boarder Field) provide an additional 928 acres of recreational opportunities. Thus, the City offers approximately 1,000 acres of parks and recreational resources.

Other Public Facilities

The Imperial Beach Library, located at 810 Imperial Beach Boulevard, is part of the greater San Diego County library system. A new, beach-themed 15,000 square-foot library opened in 2017, replacing the previous 5,000 square-foot facility. Many elements and amenities of the new library are a result of collaboration with the County, Friends of the Imperial Beach Library, the City of Imperial Beach, and community members. The library is owned and maintained by the County.

Regulatory Setting

Regulations and policies exist the state and local level with regard to public services and include:

- California Mutual Aid Plan
- Senate Bill 50
- Quimby Act and Assembly Bill 1359
- City of Imperial Beach General Plan

Checklist Discussion

a) *Less Than Significant Impact.*

The Housing Element is a policy document that does not authorize specific development projects. However, implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies addressing a range of housing needs including affordable housing. While the Housing Element update would not directly introduce new structures, future infill development and redevelopment could continue to occur to accommodate future demands. The City estimates fire protection needs based on growth as projected in the City's GP/LCP and Housing Element. It is anticipated that as new development and service levels would be consistent with existing projections (City of Imperial Beach GP/LCP Negative Declaration, 2019). Additionally, as part of the planning and development review process, new residential development projects would be evaluated by the Imperial Beach Fire Department to determine the level of and demand for fire protection services that would be generated by each project. Therefore, impacts to fire protection services will be **less than significant**.

b) *Less Than Significant Impact.*

The General Plan Housing Element is a policy document that addresses housing need in the City and does not include any specific development or rezoning/re-designation of land. Therefore, adoption would not,

in itself, create increased demand for San Diego County Sheriff Department services. The possible increase in population that may occur as a result of adoption of the Housing Element would not increase the demand for law enforcement protection service to the extent that new law enforcement 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. Future residential development projects, consistent with the City's housing needs would be evaluated by the San Diego Sheriff's Department to determine the level of and demand for police protection services that would be generated by each project. Therefore, impacts to fire protection services will be **less than significant**.

c) *Less Than Significant Impact.*

Implementation of the programs contained in the Housing Element should result in new housing that addresses the City's RHNA allocation and the City's policies addressing a range of housing needs including affordable housing. Planning for future school facilities is the responsibility of the school districts. The environmental effects of expansion, construction, and operation of additional school facilities would be evaluated by South Bay Union School District and Sweetwater Union High School District. In accordance with state law pursuant to Government Code Section 65996 and SB 50, California legislation holds that an acceptable method of offsetting a project's effect on the adequacy of school facilities is payment of a school impact fee prior to issuance of a building permit. Once paid, the school impact fees would serve as mitigation for any project-related impacts to school facilities. As such, the City is legally prohibited from imposing any additional mitigation related to school facilities, as payment of the school impact fees constitutes full and complete mitigation. Therefore, future development at identified opportunity sites would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities. Impacts related to schools would be **less than significant**.

d) *Less Than Significant Impact.*

The General Plan Housing Element is a policy document that addresses housing need in the City and does not include any specific development or rezoning/re-designation of land. Future development to meet projected population would be infill in established neighborhoods. There would be no impact on existing facilities. Additionally, as there are approximately 1,000 acres of parks and recreational uses available, potential growth would easily be accommodated by existing facilities and therefore impacts would be **less than significant**.

e) *Less Than Significant Impact.*

The Imperial Beach Library was constructed in 2017 to meet existing and future demands for library services. Any impact from potential future development on the library will be **less than significant**.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
16. RECREATION. Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

Please refer to Environmental Setting above Section 15 – Parks.

Checklist Discussion

a), b) *Less Than Significant Impact.*

Please refer to discussion above Section 15.d – Parks.

Mitigation Measures

None required.

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

Environmental Setting

The Mobility Element of the GP/LCP was updated and adopted in 2019. It establishes the framework for the City's approach to complete streets, regional access, and the increased use of active transportation in order to reduce air pollution and greenhouse gas emissions while improving health. Although no physical changes to the street system or street classifications were proposed, this mobility element update was intended to bring the GP/LCP into conformance with regional goals for transit, roadway, bicycle, and pedestrian facilities. All elements of a jurisdiction's General Plan must be internally consistent.

Regulatory Setting

Regulations and policies exist at the state, regional, and local levels as follows:

- Senate Bill 743
- SANDAG's 2050 Regional Transportation Plan
- San Diego Forward: The Regional Plan
- City of Imperial Beach General Plan
- City of Le Mesa Bicycle Facilities and Alternative Transportation Plan

Checklist Discussion

a), b) *Less Than Significant Impact.*

The project is the adoption of the City of Imperial Beach Housing Element 2021-2029 Update. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Land Use Element, to a base designation, or to any physical development standards.

Though it proposes neither specific development projects nor changes in base zoning, the Housing Element Update identifies opportunity sites that are feasible for development. The location of many of which are located proximate to transit, consistent with the overarching principles of the San Diego

Forward: The Regional Plan of increasing residential concentrations in areas served by transit and implementation of smart growth designed to strengthen the integration of land use and transportation.

Inasmuch as Housing Element Update could indirectly result in residential development and improvement, the development would occur in residential and mixed-use areas of the City already designated in the General Plan for housing. Therefore, development within these sites and their associated transportation impacts have already been accounted for in association with the adopted land use plan and Mobility Element. In addition, any future development projects supported by the Housing Element Update would be evaluated at the project proposal stage and subject to the state, regional, and local plans, and the policies therein. Therefore, impacts would be **less than significant**.

c) *Less Than Significant Impact.*

Future development supported by the Housing Element would result in typical types of traffic associated with residential and mixed-use development (i.e., residents, visitors, and employee commutes). The Housing Element 2021-2029 Update does not propose any uses that would generate traffic from incompatible uses such as farm equipment. No specific plans for any development projects are proposed at this time; however, the design of roadway improvements, access roads, intersections, and driveways of any future project would be required to adhere to City of Imperial Beach design guidelines and standards and the final design must be approved by the City prior to the issuance of development permits. Accordingly, impacts related to design hazards potentially resulting from future development supported by the Housing Element would be **less than significant**.

d) *Less Than Significant Impact.*

As discussed previously, the Housing Element Update does not include specific development projects, and instead, only provides a framework for the City's anticipated future residential growth and housing demand. Potential future residential and/or mixed-use development supported by the Housing Element would not interfere with emergency access because such projects are not anticipated to alter street locations or access. All new development in the city is required to comply with existing fire codes and ordinances regarding emergency access, such as widths, surfaces, vertical clearance, brush clearance, and allowable grades. Future access and roadways would be reviewed for consistency with City of Imperial Beach design guidelines and standards and the final design must be approved by the City. Therefore, impacts to emergency access resulting from future development supported by the Housing Element would be **less than significant**.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
18. TRIBAL CULTURAL RESOURCES. Consultation with a California Native American tribe that has requested such consultation may assist a lead agency in determining whether the project may adversely affect tribal cultural resources, and if so, how such effects may be avoided or mitigated. Whether or not consultation has been requested, would the project cause a substantial adverse change in a site, feature, place, cultural landscape, sacred place, or object, with cultural value to a California Native American tribe, which is any of the following:				
a. 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:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) A resource 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Setting

Assembly Bill 52 (AB 52, Gatto. Native Americans: California Environmental Quality Act) and CEQA Public Resources Code Section 21080.31, subdivisions (b), (d)), requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project.

California Government Code Section 65352.3 (adopted pursuant to the requirements of Senate Bill (SB) 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan, or to designate open space that includes Native American Cultural Places. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction, and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the California Office of Planning and Research's Tribal Consultation Guidelines (2005), "the intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to cultural places."

Regulatory Setting

The regulation that guides the consideration and treatment of tribal cultural resources is:

- Assembly Bill 52
- Senate Bill 18

Checklist Discussion

a) i), ii) *No Impact.*

The Housing Element is a policy document consistent with the General Plan. The project is the adoption of the City of Imperial Beach Housing Element 2021-2029 Update. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Land Use Element, to a base designation, or to any physical development standards. The Housing Element will not, in and of itself, result in impacts to tribal cultural resources. Therefore, **no impact** would occur.

Pursuant to Assembly Bill 52, California tribes now have the ability to establish, through a formal notice letter, a standing request to consult with a lead agency regarding any proposed project subject to CEQA in the geographic area with which the tribe is traditionally and culturally affiliated. The Native American Heritage Commission has authority to verify the tribes' cultural affiliation. A lead agency must provide written notification to requesting tribes on its notice list within 14 days of a decision to undertake a project or a determination that a project application is complete. Notice to the tribes must include a brief project description, the project location, and the lead agency's contact information. A tribe then has 30 days to request consultation. If the tribe does not respond in that period or writes to decline consultation, the lead agency has no further obligation. The City of Imperial Beach sent the tribal notice to the tribal affiliate for the Lipay Nation of Santa Ysabel on February 18, 2021 and did not receive a response within the 30-day period.

Mitigation Measures

None required.

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

Environmental Setting

Water

The City of Imperial Beach is served by the California American Water Company, a private water service that provides water services to an area it refers to as the San Diego County District (formerly the Coronado District). California American Water Company purchases treated potable water from the City of San Diego. The City of San Diego obtains raw water from local reservoirs, the San Diego County Water Authority, and the Metropolitan Water District. The San Diego County District also has three emergency interconnections, one with each of the following: Otay Water District, Sweetwater Authority and North Island Naval Air Station. The Metropolitan Water District supplies the majority of raw water to the City of San Diego. The Metropolitan Water District obtains raw water from the Colorado River, via aqueduct, and the Sacramento Delta. The City of San Diego then treats the raw water at its three water treatment plants.

According to California American Water Company's 2015 Urban Water Management Plan (UWMP), in 2015 the company delivered 9,298 acre feet of water to the service area (which includes Imperial Beach). The projected service demand is expected to increase to 11,971 acre feet by 2020 and to 13,111 acre feet by 2035. The California American Water Company entered a 25-year water purchase contract with the

City of San Diego in 2004, which entitles the service area to at least 60 percent of the average system delivery per customer per day, and up to 120 percent of the average system delivery per customer per day. Historically, California American Water has been able to meet 100 percent of its demand through purchased water from the City of San Diego, and the UWMP assumes that this will continue to be the case through 2020. The UWMP anticipates adequate water supply to meet projected future demand through 2035 under single and multiple dry year scenarios. Therefore, adequate water supply is available to accommodate the RHNA during the Housing Element planning period.

Senate Bill 1087 (enacted 2006) requires that water providers develop written policies that grant priority to proposed development that includes housing affordable to lower-income households. The legislation also prohibits water providers from denying or conditioning the approval of development that includes housing affordable to lower income households, unless specific written findings are made. The City will provide a copy of the adopted Housing Element to the California American Water Company within 30 days of adoption. The City will continue to coordinate with the California American Water Company to ensure priority service provision to affordable housing developments.

Wastewater

The City of Imperial Beach is a member of the San Diego Metropolitan Sewerage System (Metro). The City operates its own waste water collection system and transports the sanitary waste to Metro's South Bay Interceptor which conveys it to the regional water treatment plant on Point Loma. The present collection system consists of 11 pump stations and approximately 50 miles of sewer lines. Based on the 2000 Amendment to the Regional Wastewater Disposal Agreement between the Cities of San Diego, Chula Vista, Coronado, Del Mar, El Cajon, Imperial Beach, La Mesa, National City, Poway, and various wastewater producing special districts, the City of Imperial Beach purchased a quantity of wastewater treatment capacity based on then current and existing needs. At that time, Imperial Beach purchased 3.59 Million Gallons of treatment per day (MGD). According to recent billing statements from the City of San Diego, Imperial Beach averages approximately 2.25 MGD, leaving approximately 1.34 MGD of capacity available for future growth. This represents usage of approximately 63 percent of the total available under the existing contract. Assuming a new dwelling unit generates approximately 250 gallons of wastewater per day, 254 new units through the planning period would produce approximately 0.06 MGD, or 4.5 percent of the City's remaining contract capacity. With substantial capacity available, there would be no constraints on the availability of wastewater disposal or treatment.

Senate Bill 1087 also mandates priority sewage collection and treatment service to housing developments providing units affordable to lower-income households. The City will provide a copy of the adopted Housing Element to Metro within 30 days of adoption. The City will continue to coordinate with Metro to ensure priority service provision to affordable housing developments.

Solid Waste

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, City policies exist to support composting, which would encourage further diversion of solid waste from the landfill. A reduction measure identified in the City's

Climate Action Plan (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.

Checklist Discussion

a), b), c), d), e) *Less Than Significant Impact.*

The Housing Element itself does not proposed specific developments nor does it conflict with any other element of the General Plan/LCP. Given the built-out character of Imperial Beach, most residential areas are already served with infrastructure. Existing water delivery, wastewater collection infrastructure and solid waste disposal is available to all properties located in the residential sites inventory. Moreover, the City has adequate water and wastewater capacity to accommodate the RHNA of 1,329 units identified in the Housing Element. Any new development in the City would continue to comply with all provisions of the NPDES program as well as federal, state, and local management and reduction statutes and regulations related to solid waste The City has established specific standards for potential improvements and facilities required to serve new development, including: curb/gutter and drainage facilities, sidewalks, paved streets, landscaping, undergrounding utilities, and water and sewer service. Such improvements are required as a condition of the subdivision map, or if there is no required map, improvements are required as part of the building permit process. Therefore, implementation of the Housing Element would have a **less than significant impact**.

Mitigation Measures

None required.

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

Environmental Setting

According to the San Diego County Online Wildfire Hazard Map, the City of Imperial Beach is not located within a Fire Hazard Severity Zone. Furthermore, the City is a built-out, urban environment that does not contain wildlands and is not located adjacent to any undeveloped wildlands.

Checklist Discussion

a) *Less Than Significant Impact.*

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 Housing Element is a policy-level documents and does not propose any specific development, infrastructure construction, or increased density or intensity of uses that would impair emergency evacuation. Therefore, a **less than significant impact** would occur.

b) *Less Than Significant Impact.*

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) *Less Than Significant Impact.*

The Housing Element is a policy document that do not propose specific development. Potential future development would occur as infill, replacement or mixed use within the existing urbanized core. Thus, it would not be anticipated that any future development projects would 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. Therefore, **a less than significant impact** would occur.

d) *No Impact.*

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 area is not designated for development. Thus, there would be **no impact**.

Mitigation Measures

None required.

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

Checklist Discussion

a) **No Impact.**

The Housing Element is a General Plan policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. The Housing Element does not authorize any development. Therefore, its adoption would not significantly degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of major periods of California history or prehistory. Therefore, **no impact** would occur.

b) **Less Than Significant Impact.**

The proposed project involves the adoption of the City's General Plan Housing Element, which guides future housing. No specific development projects would occur as a result of the Housing Element; and no redesignation/rezoning of land is proposed. Therefore, adoption of the Housing Element, in itself, would not result in cumulative impacts.

Furthermore, cumulative impacts associated with future housing development have been evaluated at a program level in the General Plan EIR. The Housing Element in large measure does not propose changes

to the City's adopted housing related policies and programs including those set forth in the General Plan (Land Use Element) and the 2013-2021 Housing Element. Since the Housing Element is consistent with the General Plan, adopting the Housing Element would not create new cumulative impacts or increase the significance of cumulative impacts identified in the General Plan EIR. Therefore, impacts would be **less than significant**.

c) *Less Than Significant Impact with Mitigation Incorporated.*

Future development supported by the Housing Element would be required to comply with numerous required measures related to human safety and the quality of the environment, as described throughout this document. Therefore, adoption of the Housing Element 2021-2029 Update would result in no environmental effects that would cause substantial direct or indirect adverse effects on human beings and impacts would be **less than significant**.

Mitigation Measures

None required.