

**CALIFORNIA COASTAL COMMISSION**

SAN DIEGO AREA  
7575 METROPOLITAN DRIVE, SUITE 103  
SAN DIEGO, CA 92108-4421  
(619) 767-2370



September, 24 2018

**Th13f****TO: COMMISSIONERS AND INTERESTED PERSONS****FROM: KARL SCHWING, DEPUTY DIRECTOR, SAN DIEGO COAST DISTRICT  
DEBORAH LEE, DISTRICT MANAGER, SAN DIEGO COAST DISTRICT  
DENNIS DAVIS, COASTAL ANALYST, SAN DIEGO COAST DISTRICT****SUBJECT: STAFF RECOMMENDATION ON CITY OF IMPERIAL BEACH MAJOR LCP  
AMENDMENT NO. LCP-6-IMB-18-0060-1 (I.B. Boulevard Enhancement Project)  
for Commission Meeting of October 10-12, 2018**

---

**SYNOPSIS**

The subject project driven amendment to the City's Land Use Plan was submitted and filed as complete on August 24, 2018. Pursuant to Section 30512 of the Coastal Act, the Commission must act on LUP amendments within 90 days of filing. The date by which the Commission must take action, absent an extension of the time limits by the Commission, is November 22, 2018. In addition to this amendment, there is another pending LCP item from the City of Imperial Beach, LCPA No. LCP-6-IMB-0061-1 (Cannabis Facilities) that is scheduled for the October 2018 Commission hearing.

**SUMMARY OF AMENDMENT REQUEST**

The proposed amendment would amend Figure C-5 in the Circulation Element of the certified Land Use Plan to redesignate the street classifications for two segments of Imperial Beach Boulevard: (1) Seacoast Drive to 3<sup>th</sup> Street and (2) Connecticut Street to Florence Street. The LUP figure depicts and describes a total of six different street classifications. The Seacoast Drive to 3<sup>rd</sup> Street segment, which covers two blocks, is proposed to be redesignated from a 3 Lane Collector to a 2 Lane Collector street. The Connecticut Street to Florence Street segment, extending nineteen blocks, is proposed to be redesignated from a 4 Lane Collector to a 3 Lane Collector street.

This LCP amendment has been proposed to facilitate the Imperial Beach Boulevard Enhancement Project for the reduction of vehicular travel lanes on Imperial Beach Boulevard from Connecticut Street to Florence Street and various street improvements along all of Imperial Beach Boulevard. The removed travel lanes would be reused for a bike lane and various street improvements that will improve the safety and mobility for all modes of transit to the coast while still allowing for an acceptable level of service for vehicles traveling through this corridor. The project would also result in additional public parking along this coastal access corridor.

## **SUMMARY OF STAFF RECOMMENDATION**

Staff is recommending that the Commission approve the proposed LUP amendment as submitted. The Commission may reject LUP amendments only if the amendment would be inconsistent with the policies of Chapter 3 of the Coastal Act.

The proposed amendment would redesignate the street classifications of segments of Imperial Beach Boulevard, a major public access route to the shoreline, to accommodate the City's Imperial Beach Boulevard Enhancement Project. The City's certified LCP does not contain any specific policies to support or prohibit changes to coastal access corridors. However, "Figure C-5" in the certified Circulation Element needs to be revised to accommodate the City's desired roadway improvements.

Circulation Elements are developed to establish roadway configurations and circulation standards for communities; they are typically incorporated into land use plans as a means to plan future road infrastructure, proactively address the need to protect sensitive resources, and ensure coastal access opportunities are maintained. Removal of travel lanes could have adverse impacts on coastal access/mobility by altering access patterns or excluding access, especially along major coastal access corridors. Additionally, road modifications could potentially have adverse effects on water quality, biological resources, visual resources, and community character.

As submitted, the proposed LUP amendment will enhance public access along Imperial Beach Boulevard by promoting alternative transit and multi-modal opportunities while still allowing for an acceptable level of service, or at least not exacerbating traffic conditions, at major intersections for vehicles traveling through this corridor. The amendment will also provide space for water quality improvements in the corridor and reduce the total amount of impervious surfaces by adding landscaping. All work will occur within the existing public right-of-way. No sensitive habitats are located within the affected corridor and thus no significant adverse impacts to biological resources are anticipated. Additionally, the City's LCP already contains policies to protect water quality, biological resources, visual resources, and community character which would apply to a major roadway modification project. Therefore, the proposed amendment does conform to the policies and requirements of Chapter 3 of the Coastal Act.

The subject amendment is relatively small in scope but will likely serve as a precedent for Seacoast Drive which is a major north/south corridor along the City's shoreline. The City is working on a comprehensive LCP Update and has agreed to develop broader policy direction to address any future road modifications on significant travel corridors.

The appropriate resolution and motion can be found on Page 5. The findings for approval of the Land Use Plan Amendment as submitted begin on Page 6.

**ADDITIONAL INFORMATION**

Further information on the City of Imperial Beach LCP Amendment No. LCP-6-IMB-18-0061-1 may be obtained from Dennis Davis, Coastal Planner, at (619) 767-2370.

---

**EXHIBITS**

[Exhibit 1 – Vicinity Map](#)

[Exhibit 2 – Resolution No. 2018-7948](#)

[Exhibit 3 – Existing/Proposed Figure C-5](#)

## **PART I. OVERVIEW**

### **A. LCP HISTORY**

On June 30, 1981, the City of Imperial Beach formally submitted its Land Use Plan (LUP) for Commission approval. The plan, as originally submitted, comprised the City's entire General Plan (10 elements and a policy plan). Since the plan contained a large volume of material that was not coastal-related and policies addressing coastal issues were found throughout many of the elements, staff summarized the coastal policies into one document. This policy summary along with the Land Use Element was submitted to the Commission as the LCP Land Use Plan.

On September 15, 1981, the Commission found substantial issue with the LUP, as submitted, denied and then conditionally approved the LUP with recommended policy changes for all policy groups. The City resubmitted the LCP Land Use Plan in early 1982, incorporating most of the Commission's suggested policy modifications. This included modification language related to the preservation and protection of Oneonta Slough/Tijuana River Estuary and South San Diego Bay, preservation and enhancement of coastal access and the provision for visitor-serving commercial uses in the Seacoast District. On March 16, 1982, the Commission certified the City of Imperial Beach LCP Land Use Plan as submitted. The Commission on November 18, 1982, effectively certified the land use plan. In 1983, prior to certification of the Implementation Plan, the Commission approved an amendment to the LUP to correct a mapping error.

On August 15, 1983, the City began issuing coastal development permits pursuant to Section 30600.5 (Hannigan provisions) of the Coastal Act based on project compliance with its certified LUP. The City then submitted its entire Zoning Ordinance in order to implement the provisions of the certified Land Use Plan. The zoning ordinance was completely rewritten in order to implement the LUP. On September 26, 1984, the Commission approved the LCP/Implementation Plan as submitted. As of February 13, 1985, the City has been issuing coastal development permits under a certified local coastal program.

### **B. STANDARD OF REVIEW**

The standard of review for land use plans, or their amendments, is found in Section 30512 of the Coastal Act. This section requires the Commission to certify an LUP or LUP amendment if it finds that it meets the requirements of Chapter 3 of the Coastal Act. Specifically, it states:

#### Section 30512

(c) The Commission shall certify a land use plan, or any amendments thereto, if it finds that a land use plan meets the requirements of, and is in conformity with, the policies of Chapter 3 (commencing with Section 30200). Except as provided in paragraph (1) of subdivision (a), a decision to certify shall require a majority vote of the appointed membership of the Commission.

**C. PUBLIC PARTICIPATION**

Section 30503 of the Coastal Act requires local governments to provide the public with maximum opportunities to participate in the development of the LCP amendment prior to its submittal to the Commission for review. The City has held City Council meetings with regard to the subject amendment request. All of those local hearings were duly noticed to the public. Notice of the subject amendment has been distributed to all known interested parties.

**PART II. LOCAL COASTAL PROGRAM SUBMITTAL - RESOLUTION**

Following a public hearing, staff recommends the Commission adopt the following resolution and findings. The appropriate motion to introduce the resolution and a staff recommendation are provided just prior to the resolution.

**MOTION:**     *I move that the Commission certify the Land Use Plan Amendment for the City of Imperial Beach as submitted.*

**STAFF RECOMMENDATION TO CERTIFY:**

Staff recommends a **YES** vote. Passage of this motion will result in certification of the land use plan amendment as submitted and adoption of the following resolution and findings. The motion to certify as submitted passes only upon an affirmative vote of a majority of the appointed Commissioners.

**RESOLUTION TO CERTIFY LAND USE PLAN AMENDMENT AS SUBMITTED:**

The Commission hereby certifies the Land Use Plan Amendment for the City of Imperial Beach as submitted and adopts the findings set forth below on grounds that the land use plan will meet the requirements of and be in conformity with the policies of Chapter 3 of the Coastal Act. Certification of the land use plan complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the plan on the environment, or 2) there are no further feasible alternatives and mitigation measures that would substantially lessen any significant adverse impacts on the environment that will result from certification of the land use plan amendment.

**PART III. FINDINGS FOR APPROVAL OF THE CITY OF IMPERIAL BEACH  
LAND USE PLAN AMENDMENT, AS SUBMITTED**

**A. AMENDMENT DESCRIPTION**

The City is proposing to amend Figure C-5 in the Circulation Element of the certified LUP. The LUP figure depicts and describes six different street classifications, which include 6 Lane Prime Arterial, 4 Lane Major Street, 4 Lane Collector (Class I), 3 Lane Collector (Class II), 2 Lane Collector (Class III), and Residential Street. The amendment would redesignate the street classifications for two segments of Imperial Beach Boulevard. The first segment, from Seacoast Drive to 3<sup>th</sup> Street, which covers two blocks, is proposed to be redesignated from a 3 Lane Collector to a 2 Lane Collector street. Although this segment is currently classified as a 3 Lane Collector, it already functions as a 2 Lane Collector street with one vehicular eastbound travel lane and one westbound travel lane. According to the City, there was never community desire or high enough traffic counts to justify expanding this segment of Imperial Beach Boulevard to three lanes. Thus, no physical reduction in lanes will occur along this segment but the road classification is being revised to reflect the existing condition.

The second segment, from Connecticut Street to Florence Street, extending nineteen blocks, is proposed to be redesignated from a 4 Lane Collector to a 3 Lane Collector street. As a result, one vehicular travel lane would be removed from this segment of Imperial Beach Boulevard.

**B. CONFORMANCE WITH SECTION 30001.5 OF THE COASTAL ACT**

The Commission finds, pursuant to Section 30512.2b of the Coastal Act, that portions of the Land Use Plan as set forth in the preceding resolutions, are in conformance with the policies and requirements of Chapter 3 of the Coastal Act to the extent necessary to achieve the basic state goals specified in Section 30001.5 of the Coastal Act which states:

The legislature further finds and declares that the basic goals of the state for the Coastal Zone are to:

- a) Protect, maintain and, where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and manmade resources.
- b) Assure orderly, balanced utilization and conservation of coastal zone resources taking into account the social and economic needs of the people of the state.
- c) Maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resource conservation principles and constitutionally protected rights or private property owners.
- (d) Assure priority for coastal-dependent and coastal-related development over other development on the coast.

(e) Encourage state and local initiatives and cooperation in preparing procedures to implement coordinated planning and development for mutually beneficial uses, including educational uses, in the coastal zone.

The Commission therefore finds, for the specific reasons detailed below, that the land use plan does conform with Chapter 3 of the Coastal Act and the goals of the state for the coastal zone with regards to LCP Amendment No. LCP-6-IMB-18-0060-1.

**C. CONFORMITY OF THE CITY OF IMPERIAL BEACH LAND USE PLAN AMENDMENT WITH CHAPTER 3**

The following Chapter 3 public access policies are pertinent to the proposed amendment and state:

Coastal Act Section 30210 states:

*In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.*

Section 30212.5 states:

*Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.*

Section 30231 states in part:

*The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, [ . . . ] encouraging waste water reclamation, [ . . . ]*

Section 30240 states in part:

- (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.*
- (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which*

*would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.*

[ . . . ]

Section 30251 states in part:

*The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, [ . . . ]*

### **Public Access**

The Coastal Act broadly protects public access for all by providing for maximum access to the coast and enhancing opportunities to recreate at and visit the shoreline. Section 30210 requires that maximum access and recreational opportunities be provided and Section 30212.5 requires that public facilities be distributed throughout an area to mitigate against adverse impacts to the public. Removal of travel lanes on a major coastal access route has the potential to adversely impact public access to the coast and to adversely impact the coastal route itself as a recreational amenity.

Imperial Beach Boulevard is a major public access route to the coast that extends easterly from Seacoast Drive to the eastern City limits where it turns into Coronado Avenue in the City of San Diego. Seacoast Drive is the City's primary north/south corridor and also represents the first public road along much of the City's ocean frontage. When the City's LCP was certified by the Commission in the mid-1980s, it was not anticipated that the City would propose to reduce travel lanes or make major road modifications to Imperial Beach Boulevard or any other major coastal access routes. As a result, the LCP does not contain any discussion or planning policies that provide guidance as to how and when road modifications would occur.

This amendment would redesignate the current street classification of segments of Imperial Beach Boulevard to facilitate the City's Imperial Beach Boulevard Enhancement Project. The City's Imperial Beach Boulevard Enhancement Project seeks to only remove one vehicular travel lane in both directions (east/west) between Connecticut Street to Florence Street. The lane is then proposed to be reused for a dedicated bike lane that will continue west towards Seacoast Drive and to create sixty-one on-street public parking spaces. Additionally, the approved project also proposes to widen existing sidewalks, remove existing raised medians, construct new concrete pads for bus stops, install additional crosswalks, and construct water quality improvements. The City prepared a mobility assessment to determine whether any adverse impacts to public access would result from the reduction in travel lanes. Using the most conservative representation of traffic conditions along Imperial Beach Boulevard when calculating traffic volumes, the mobility assessment showed that with the lane reduction and other street improvements, this proposed street reclassification and the related enhancement

project would not have a substantial adverse impact on travel times through the corridor. With the proposed street reclassification and related project, the majority of the major intersections along Imperial Beach Boulevard are expected to operate at an acceptable level of service (LOS D or higher) even at peak hour conditions. The exception is the Imperial Beach Boulevard/Connecticut Street intersection which currently operates at LOS E during the AM peak hour with a thirty-eight second delay at this intersection per vehicle. With this amendment and the related project, the Imperial Beach Boulevard/Connecticut Street intersection will still operate at LOS E during the AM peak hour but will improve slightly with a thirty-five second delay per vehicle. Thus, the street reclassification and related project will not exacerbate the level of service at this intersection for the duration of the AM peak hour.

Furthermore, the project would enhance public access to the beach by providing dedicated corridors for low-impact modes of travel (e.g. bikes, walkways, etc.) to the coast and adding sixty-one public parking spaces on Imperial Beach Boulevard. Improvements to Imperial Beach Boulevard will improve the safety and mobility for all modes of transit to the coast while still allowing for an acceptable level of service for vehicles traveling through this corridor. Therefore, redesignation of the street classification for segments of Imperial Beach Boulevard is not anticipated to result in adverse impacts to public access.

### **Water Quality**

Major roadway modification projects often involve significant infrastructure changes within the existing roadway and can adversely impact water quality if an impervious surface area is increased or significant landscaped areas are removed. However, roadway modification projects can also result in improved water quality if impervious surface areas are decreased or through the construction of infrastructure, the amount of stormwater and runoff that is captured and treated before reaching coastal waterways is increased or the installation of drought-tolerant and native landscaping is expanded.

In the case of the related Imperial Beach Boulevard Enhancement Project, the travel lane will be replaced with a dedicated bike lane and thus not add to the amount of impervious surface currently in the corridor. The project will also make water quality improvements in the corridor and reduce the total amount of impervious surfaces by adding landscaping. Therefore, redesignation of the street classification for segments of Imperial Beach Boulevard is not anticipated to result in adverse impacts to water quality.

### **Biological Resources**

Sensitive habitat area near major roadway modification projects could be disrupted or negatively impacted, especially if the roadway modification involves expansion outside its existing right-of-way. The Tijuana Slough National Wildlife Refuge is located south of Imperial Beach Boulevard. The slough, which consists of mostly saltmarsh, provides a habitat for many migrating shorebirds. The northernmost boundary of the refuge abuts the public right-of-way for the Seacoast Drive to 3<sup>rd</sup> Street segment of Imperial Beach.

No sensitive habitat areas exist within the Imperial Beach Boulevard right-of-way. This amendment does not allow for an expansion of travel lanes and all work proposed under the related enhancement project will occur within the existing right-of-way. Additionally, the City's LCP contains policies to protect the wetlands from any proposed roadway modifications. Therefore, the redesignation of the street classification for segments of Imperial Beach Boulevard is not anticipated to result in adverse impacts to any biological resources.

### **Visual Resources/Community Character**

Major roadway modification projects must be sensitive to community character and preserve existing visual resources. The amendment would allow for a reduction in vehicular travel lanes along Imperial Beach Boulevard. The City of Imperial Beach is about four square miles in size making it one of the smallest cities in San Diego County. The City's LCP highlights that one of the City's key goals is the retention of the quality of life and atmosphere of a small beach-oriented town.

The Imperial Beach Boulevard corridor starts at the eastern limits of the City and extends a little under two miles west to Seacoast Drive. Imperial Beach Boulevard provides a major point of entry into the City. The eastern end of the corridor provides access to much of the City's commercial zones containing visitor-serving uses for coastal tourists and locals alike. The middle of the corridor provides access to many of the City's community assets such as parks and schools. The western end of the corridor provides expansive views of the Tijuana Slough National Wildlife Refuge along the eastbound travel lane. The corridor ends with limited views of the Pacific Ocean as it empties out onto Seacoast Drive.

This amendment would redesignate the current street classification of segments of Imperial Beach Boulevard to facilitate the City's roadway enhancement plans for this major coastal access route. The roadway improvements from the proposed street reclassification and related project will occur at or near grade and thus are not expected to adversely impact views along the corridor. All work will occur within the existing public right-of-way and is expected to enhance the traveling experience through this corridor. This amendment will add to the City's small-town character by removing a travel lane, which will not exacerbate traffic conditions above an acceptable level of service, and use that space to add public amenities that will help retain the atmosphere of a small beach-oriented town. No major vegetation is located within the corridor. The City's LCP contains policies that emphasize the aesthetic qualities of all streets and requires that natural scenic amenities such as mature trees, watercourses and views should be integrated into a project's design. Therefore, the redesignation of the street classification for segments of Imperial Beach Boulevard is not anticipated to result in adverse impacts to visual resources or community character. In conclusion, the amendment is consistent with the policies of Chapter 3 of the Coastal Act and, therefore, can be approved as submitted.

**PART IV. CONSISTENCY WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

Section 21080.9 of the California Environmental Quality Act (CEQA) exempts local government from the requirement of preparing an environmental impact report (EIR) in connection with its local coastal program. The Commission's LCP review and approval program has been found by the Resources Agency to be functionally equivalent to the EIR process. Thus, under CEQA Section 21080.5, the Commission is relieved of the responsibility to prepare an EIR for each LCP submission.

The City determined that the proposed amendment was CEQA exemption under Sections 15301 (Existing Facilities) and 15304 (Minor Alterations to Land). Nevertheless, the Commission is required in an LCP submittal or, as in this case, an LCP amendment submittal, to find that the LCP, or LCP, as amended, does conform with CEQA provisions. All of the proposed improvements will be located in a fully urbanized area within existing City streets, facilities and rights-of-way. Therefore, the Commission finds that no significant impacts to any coastal resources are anticipated.