

Letter L6

From: Jim Nakagawa
To: CDE
Cc: Dan Johnson; Anthony; Michelle; Stephanie; Steven; David; Robert; Steven; Tyler; Phil; Brian; Monica; D; Steven; Kaye; Jeff; Francisco; Andrew; Herbert; Katie; Hilary; Sara; David; Joseph; James; David; Steven; James
Subject: San Diego County Climate Action Plan - comment
Date: Monday, September 25, 2017 4:18:00 PM
Attachments: images001.png; 152-612-3460561header.pdf

ATTN: Maggie Soffel:
 I offer the following comments on San Diego County's draft Climate Action Plan (CAP):

- Chap ES-4: The statement "the County has limited options for implementing transportation-based strategies" (even though 45% of GHG emissions are attributable to transportation) seems to contradict Chap 3-17 (Strategy T-2) "The County can influence trips ... by implementing transportation demand management (TDM) strategies." How much would this strategy reduce the GHG emissions? Attached is a comment letter from SANDAG on our Commercial Rezoning Amendment suggesting that TDM strategies be used to mitigate for GHG emissions.
- Chap 3-7: Isn't the Purchase of Agriculture Conservation Easement (PACE) basically the same as the Williamson Act program? Wouldn't people likely to confuse it with the Property Assessed Clean Energy programs (PACE)?
- Chap 3-14: This page references "complete streets." Will this CAP include a Complete Streets policy?
- Chap 3-74 (rain barrels): While we haven't established rain barrel standards, consider a maximum size for installations in the front yard to mitigate for visual impact.



- Chap 4-7 (Efforts Related to Sea-Level Rise) and Chap 4-12 (Prepare for Sea-Level Rise): You may want to mention that the County of San Diego received a Coastal Commission grant to update its LCP to address SLR.

San Diego District	County of San Diego	2	County of San Diego Local Coastal Program Update	\$52,000
	City of Oceanside	3	City of Oceanside LCP Update	\$200,000
	City of Carlsbad	2*	Local Coastal Program (LCP) Planning and Sea Level Rise Update	\$228,000
	City of Solana Beach	1	Solana Beach Local Implementation Program and Mitigation Fee Program	\$120,000
	City of Del Mar	2*	Local Coastal Program Amendment to Address Sea Level Rise	\$100,000
		3	City of Del Mar Supplemental Sea Level Rise Analysis	\$211,220
	City of Imperial Beach	3	Imperial Beach LCP Climate Action Plan	\$225,000



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L6-1
 L6-2
 L6-3
 L6-4
 L6-5

Response to Comment Letter L6

City of Imperial Beach, Community Development Department
Jim Nakagawa, AICP, City Planner
September 25, 2017

L6-1 The comment asks how much GHG emission reductions would be achieved by GHG Reduction Strategy T-2. The comment also attached a letter from SANDAG on their Commercial Rezoning Amendment. Strategy T-2 includes four measures that combined would result in a total of 11,711 metric tons of GHG reductions in 2030. The TDM measure (Measure T-2.2) that the comment specifically references would achieve reductions of 2,180 metric tons of GHGs in 2030. Please refer to pages 3-17 through 3-25 of the CAP for additional details on reductions. The attached letter from SANDAG generally discusses TDM strategies. As previously discussed in the response to comment L4-5, the proposed TDM program focuses on non-residential uses to provide more consistent tracking of program implementation.

L6-2 The comment questions whether the County's Purchase of Agricultural Conservation Easement (PACE) program is the same as the Williamson Act Program and whether it would be confused with the Property Assessed Clean Energy Programs. As described on page 3-12 of the CAP, the County's existing PACE program involves the long-term preservation of agriculture in the County. Under the County's existing PACE program, willing agricultural property owners receive compensation for placing a perpetual easement on their agricultural land that limits future uses and extinguishes future development potential. CAP Measure T-1.2 would expand the County's existing PACE program. The California Land Conservation Act of 1965, which is commonly known as the Williamson Act, allows local governments to enter in to contracts with private landowners to restrict specific parcels to agricultural and open space uses. In exchange, the property owners receive lower property tax assessment. While similar

	<p>in purpose to the County's PACE program, the Williamson Act program allows landowners to exit contracts and ultimately regain development potential of the site. The County's PACE program would permanently protect lands for agriculture uses.</p> <p>L6-3 The comment asks whether the CAP will include a complete streets program. The CAP incorporates complete streets concepts into implementation of Measure T-1.3 (Update Community Plans) and Measure T-2.1 (Improve Roadway Segments as Multi-modal). Additionally, the County is currently in the process of developing an Active Transportation Plan that considers inclusion of a Complete Streets policy.</p> <p>L6-4 The comment asks the County to consider a maximum size of rain barrels that could be installed in front yards to mitigate for visual impacts. The Draft SEIR programmatically evaluated the visual impacts of implementation of the CAP in Table 1-1 of the Chapter 1, "Project Description." As described therein, GHG Reduction Measure 2-1, which would promote the use of rain barrels to capture rainwater, was determined to result in less-than-significant environmental impacts because no direct or indirect physical changes (e.g., construction) to the environment would occur and infrastructure would be small-scale. Further, residential improvements would be subject to the County's building codes and standards. Nonetheless, the commenter's suggestion is noted. The comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.</p> <p>L6-5 The comment indicated that the County received a Coastal Commission grant to update its Local Coastal Program. The County acknowledges this comment. This comment does not address the adequacy of the Draft SEIR. The comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.</p>
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June 4, 2012

File Number 3330300

Mr. Jim Nakagawa, AICP, City Planner
Community Development Department
City of Imperial Beach
825 Imperial Beach Blvd.
Imperial Beach, CA 91932

Dear Mr. Nakagawa:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) and General Plan Amendment (GPA)/Local Coastal Program Amendment (LCPA), which proposes to amend the Imperial Beach General Plan and Zoning Ordinance for properties designated C-1 in the Palm Avenue study area, C-2 (Seacoast Commercial) in the Old Palm Avenue and Seacoast Drive study area, and C-3 (Neighborhood Commercial) in the 13th Street Corridor study areas. Also included in the proposed project are areas zoned R-1500 (High-Density Residential) and subject to the MU-1 overlay designation in the Palm Avenue study area and the MU-2 overlay designation in the Seacoast Drive study area.

Our comments are based on policies included in the Regional Comprehensive Plan (RCP) and the 2050 Regional Transportation Plan and its Sustainable Communities Strategy (2050 RTP/SCS) and are submitted from a regional perspective, emphasizing the need for land use and transportation coordination and implementation of smart growth and sustainable development principles. The goal of these regional plans is to focus housing and job growth in urbanized areas where there is existing and planned transportation infrastructure to create a more sustainable region. The project site is located within a Community Center and Mixed-Use Transit Smart Growth Opportunity Area on the San Diego Association of Governments (SANDAG) Smart Growth Concept Map, which calls for higher-density, mixed-use development in a pedestrian-friendly environment with access to public transit.

The 2050 RTP/SCS sets forth a multimodal approach to meeting the region's transportation needs. Therefore, it is recommended that the traffic analysis consider the needs of motorists, transit riders, pedestrians, and bicyclists, and the implementation of a robust Transportation Demand Management (TDM) Program.

L6-6

L6-6

As discussed in the response to L6-2, the attached letter does not address the CAP or the Draft SEIR; therefore, no further response is required.

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SANDAG recommends that the following comments be addressed and analyzed in the DEIR and GPA/LCPA.

Parking

- 1.5 – 2 spaces per residential dwelling unit is slightly high for a smart growth area – 1.25 spaces is recommended in the SANDAG study “Parking Strategies for Smart Growth.”
- We support the City’s proposal for shared parking. To further decrease parking demand, the City may want to consider a comprehensive parking management plan that includes strategies such as unbundled parking and a demand-based approach to managing parking supply in areas with high retail and service activity. Pricing parking appropriately in these areas can improve access to businesses by discouraging long-term street parking and can help to eliminate the problem of cruising for parking spaces, which congests streets and pollutes the air.

Trip Generation

- As a Smart Growth Opportunity Area, the SANDAG mixed-use methodology provided in “Trip Generation for Smart Growth” may be appropriate for estimating trip generation.

Bicycle Encouragement

- We support the bicycle facilities (parking and storage) standards for new developments as described in Policy L-4a. The City may also want to consider a public bike station and adequate public bike parking (racks or corrals) around commercial centers to support the City’s investment in bicycle infrastructure and the proposed eco-bikeway project.

Transportation Demand Management

- Consider developing a TDM plan that can support congestion mitigation and air quality objectives and increase mobility in and around these commercial/mixed-use corridors. TDM is a cost-effective way to build capacity in a community’s transportation system by expanding participation in alternative modes (carpools, vanpools, transit, biking, walking, and teleworking) instead of widening or building new roads, which are costly to construct and maintain. Additionally, TDM programs can support the City’s goal of creating a pedestrian-oriented and bicycle-friendly community. The City may want to consider a TDM program that includes:
 - TDM requirements for new developments to provide amenities and or incentives that encourage occupants to use alternative modes of transportation. This can be accomplished by requiring trip-reduction plans for new developments that identify non-SOV mode share targets and various strategies to help achieve those targets over a certain time frame;
 - Provision of public TDM amenities such as bikeshare and carshare; and
 - Marketing and promotion of TDM programs to employers and commuters.

A complete list of TDM strategies for the City’s consideration is included in *Integrating Transportation Demand Management into the Planning and Development Process - A Reference for Cities* (referenced in this letter). We suggest that the City work with iCommute on TDM initiatives.

L6-6
cont.

Consultation with the Metropolitan Transit Service (MTS) and Caltrans

SANDAG advises the project applicant to consult with MTS, the transit service provider within the project area, and with Caltrans to coordinate planned transit and/or highway improvements.

Other Considerations

Please consider the following State of California laws and Executive Order when developing the DEIR: Assembly Bill 32 (Nunez, 2006), Senate Bill 375 (Steinberg, 2008) (SB 375), SB 97 (Dutton, 2007), and Executive Order S-13-08, which call for analysis of greenhouse gas emissions. Additionally, it is suggested that consideration be given to the policies included in the SANDAG Regional Energy Strategy that promote the reduction of energy demand and water consumption.

We appreciate the opportunity to comment on the DEIR and GPA/LCPA. SANDAG understands the challenges involved in infill development and the short- to mid-term impacts that it may cause. Therefore, we encourage the City of Imperial Beach, where appropriate, to consider the following tools in evaluating this update based on the following SANDAG publications, which can be found on our Web site at www.sandag.org/igr.

- (1) *Designing for Smart Growth, Creating Great Places in the San Diego Region*
- (2) *Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region*
- (3) *Trip Generation for Smart Growth*
- (4) *Parking Strategies for Smart Growth*
- (5) *Regional Multimodal Transportation Analysis: Alternative Approaches for Preparing Multimodal Transportation Analysis in EIRs*
- (6) *Integrating Transportation Demand Management into the Planning and Development Process - A Reference for Cities*
- (7) *Riding to 2050, the San Diego Regional Bike Plan*

If you have any questions or concerns regarding this letter, please contact me at (619) 699-1943 or sba@sandag.org

Sincerely,



SUSAN BALDWIN
Senior Regional Planner

MST/SBA/RSA/sgr

L6-6
cont.