

comments re Coastal Commission's 2015 Revised Sea Level Rise Policy Guidance

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To Hilary Papendick and Lesley Ewing:

The land use pattern along the coastline of Imperial Beach is probably similar to that of many coastal cities in California. We have a mix of retail businesses, residential units, public parks, public infrastructure, a world-recognized estuary, and a new hotel. The common thread that binds and runs through all of these uses is the public beach. This beach not only provides sustenance for our recreational tourist economy but it protects the estuary that our ecotourists visit which is also important to our economy. Our city, however, is not characterized by high coastal bluffs or extensive upland areas (as perhaps other cities are) to which these uses can retreat to as the sea level rises.

Our city is currently preparing a sea level rise (SLR) study funded by a Climate Ready grant from the Coastal Conservancy that will assess the vulnerabilities of these coastal uses from SLR impacts and identify reasonable adaptation strategies to protect our coastal resources. To facilitate the process and make relevant the meaning of this study to the stakeholders, we have included in our steering committee and stakeholder group not only staff members and the consultant team but representatives from adjoining agencies and NGO's, such as the US Navy, the Tijuana River National Estuarine Research Reserve, Wildcoast, public utilities, the Chamber of Commerce, Environmental Health Coalition, citizens committees, and many others.

The Coastal Act recognizes priority coastal dependent uses (such as visitor-serving accommodations, public beaches, public infrastructure, public parks, environmentally sensitive habitat areas, etc.) as deserving of greater and longer protection from coastal hazards than lesser land uses. However, it would seem that a stringline consisting of a variety of discontinuous protective measures, each with a different shelf life depending upon the priority ranking of the land use, would provide weak links along this defensive line and expose even the priority uses to coastal hazards. While the conclusion of our SLR study is yet many months away, it would not appear out of the range of options to consider that a consistent adaptation strategy along the coastline would be effective in providing for this coastal protection. Since the sandy beach is the common element that can provide this protection, it would appear that

a strategy to retain the beach sand (in conjunction with other soft structure/living shoreline strategies) should assume a more conspicuous place among the options to consider.

SANDAG has been depositing sand in Imperial Beach as a part of its Regional Beach Sand Replenishment program and Imperial Beach has been able from time to time to obtain sand from other harbor dredging programs to replenish our beaches. SANDAG's Shoreline Preservation Group has been trying to update its 2001 Regional Beach Sand Retention Strategy. With the increased awareness that SLR may exacerbate this beach sand loss, we would anticipate that this retention strategy would be deserving of increased attention. Trying to address this issue at just the local level (Chapter 7 Section A.3) should prove futile; it must be addressed at a regional level.

Imperial Beach recognizes that our city faces coastal hazards on three fronts: San Diego Bay/Otay River on the north, the Pacific Ocean on the west, and riverine flooding from the Tijuana River on the south. Since SLR impacts should be addressed at a regional level, we have included not only the US Navy as a partner in this study (who has extensive assets such as the nearby beach training facilities along the Silver Strand, ship docking areas, and airfields that appear vulnerable to SLR impacts that could compromise their national security mission), but we have members from the NGO's who interface with our counterparts in Mexico that gives us the opportunity to be able to start the discussion about SLR impacts south of the border. Due to our geographic location where our city limits abut the City of Tijuana, we can see from our vantage point that we will need to extend the definition of region to include an international component, our neighbor Mexico, where we share not only a common border but a common watershed and oceanfront, areas we have recognized that need to be studied for SLR impacts to its citizens and resources and where such work will be transformed into something closer to a collaborative global effort. Perhaps with the Coastal Commission's Sea Level Rise Policy Guidance document, it may be used as a tool to move us in that direction.

Councilmember Ed Spriggs mentioned at a recent Coastal Cities conference call that there should be a state-wide (in addition to a regional) collaborative or repository where data and information may be exchanged and placed for others to share and review.

I would like to add as an additional rationale for addressing SLR in LCPs that as these policies are considered and implemented when cities and the Coastal Commission review permits and LCP amendments, that a rational nexus must be made between a requirement and a project's impact (*Nollan v. California Coastal Commission*, 483 U.S. 825 (1987)). Any zoning amendment (which would be an amendment to the implementation component of the LCP) would need to be consistent with the general plan per Government Code Section 65860 and any acquisitions would need to satisfy the consistency requirement per Government Code Section 65402.

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