
Appendix H

Palm Avenue Complete Multi-Modal Corridor Project - Transportation CEQA Memorandum



TO: Roberto Ruiz-Salas, PE; CR Associates

FROM: Trevor Briggs, PE, CR Associates

DATE: October 31, 2025

RE: Palm Avenue Complete Multi-Modal Corridor Project – Transportation CEQA Memorandum

The purpose of this Transportation CEQA Memorandum is to document the results of the transportation analysis conducted for the Palm Avenue Complete Multi-Modal Corridor Project (the “Project”) in the City of Imperial Beach, California. This memorandum evaluates the Project’s features against the transportation-related questions presented in Appendix G of the CEQA Guidelines to determine whether the Project would result in a significant transportation-related impact under CEQA.

Project Description

The Palm Avenue Complete Multi-Modal Corridor Project proposes to transform Palm Avenue between Rainbow Drive and Georgia Street into a multimodal complete street corridor that improves safety, accessibility, and visual character. The project will strengthen regional connectivity by linking with surrounding active transportation initiatives, including the Bayshore Bikeway, 9th Street Enhancement Project, and Border to Bayshore project. The general suite of traffic-related improvements proposed along the corridor will include the following:

- Class IV protected bike lanes next to the curb, separated by a concrete 2-foot-wide median within a 3’ buffer, where existing public right-of-way allows.
- Provide transit amenities.
- Incorporate on-street parking configuration changes, relocations, and removals at selected locations.
- Realign select intersections to improve operations and safety.
- Widen existing sidewalk to 10’ wide where possible.
- Construct curb extensions with directional ramps at all side street crossings.
- Rebuild alley entrances, driveways and curb ramps to be ADA compliant.

All traffic signal modifications will be designed in conformance with California Manual on Uniform Traffic Control Devices (CA MUTCD) standards and in coordination with the City’s traffic engineering department

Transportation Impact Analysis

The following addresses the four transportation-related questions from Appendix G of the CEQA Guidelines.

a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

No. Based on review of the Palm Avenue Complete Multi-Modal Corridor Project application, the proposed improvements would not conflict with any adopted program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The

project is consistent with several adopted City and regional planning documents, including the City of Imperial Beach Bicycle Master Plan, Local Road Safety Plan (LRSP), and the SANDAG Regional Plan.

The City of Imperial Beach Bicycle Master Plan recommends a Class I Bike Path along State Route 75 (SR-75) west of Rainbow Drive and a Class II Bike Lane along Palm Avenue from Delaware Street to the eastern City limit. A bicycle facility is not recommended in the Bicycle Master Plan along SR-75 from Rainbow Drive to Delaware Street. The Palm Avenue Complete Multi-Modal Corridor Project proposes Class IV Protected Bike Lanes along SR-75/Palm Avenue from Rainbow Drive to eastern City limit. Since the Project is upgrading the bicycle facilities along Palm Avenue in the Bicycle Master Plan to protected bike lanes, the Project would be considered consistent with the Bicycle Master Plan.

The City's Local Road Safety Plan recommended safety-related improvements along Palm Avenue, such as the installation of bicycle crossings at signalized intersections along Palm Avenue, as well as signal upgrades and curb bulb-outs at the intersections of Palm Avenue at 9th Street and Palm Avenue at 13th Street. The Palm Avenue Complete Multi-Modal Corridor Project proposes similar improvements to the LRSP, as noted in the project description. As such, the Project would be considered consistent with the City's LRSP.

The SANDAG 2021 Regional Plan designates Palm Avenue as a Regional Arterial with operational and technology improvements as part of the 2050 Complete Corridor Bike Network and Arterials, as well as a roadway with Local Bus service. It should also be noted that Palm Avenue in the City of Imperial Beach is within a Regional Mobility Hub Area, which are considered communities with a convenient mix of travel choices, safer streets, and supporting amenities that help people get to and from transit services without relying on a car. The Palm Avenue Complete Multi-Modal Corridor Project will provide Class IV Protected Bike Lanes, transit amenities, and improve safety and operations at signalized intersections along Palm Avenue to promote multimodal activity in line with the SANDAG Regional Plan. Therefore, the Project would be considered consistent with the SANDAG Regional Plan.

As noted above, the Project is in compliance with the goals and policies of local and regional guiding transportation plans.

b) Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?

No. CEQA Guidelines §15064.3 sets vehicle miles traveled (VMT) as the metric for transportation impacts. For transportation projects, the key question is whether the project would induce additional driving; projects that reduce or do not increase VMT are generally considered less than significant. A qualitative explanation is acceptable when models are unnecessary or the effects are clear.

The Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory, December 2018) states that "...active transportation projects generally reduce VMT and therefore are presumed to cause a less-than-significant impact on transportation." The Palm Avenue Complete Multi-Modal Corridor Project is a active transportation project, as noted by the improvements in the project description.

As a result, the project would not conflict with §15064.3(b) and would result in a less-than-significant transportation impact under the VMT metric. Any construction-period traffic effects would be temporary and managed through standard measures (i.e. a traffic management plan). If future design changes were to introduce new auto capacity, a project-level induced travel/VMT analysis would be warranted.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No. The project would not substantially increase hazards due to geometric design features or incompatible uses. The roadway improvements and traffic signal modifications as noted in the project description will be designed to applicable standards. Driveway and alley treatments would be rebuilt to current ADA standards with visibility triangles and marked conflict zones, and intersection geometry may be refined (i.e. tighter curb radii, protected-intersection elements) to lower turning speeds. All improvements will be designed to applicable City standards and the CA MUTCD. With standard construction-period traffic control to manage temporary conditions, the project would not create new geometric or use hazards; therefore, the impact would be less than significant.

d) Would the project result in inadequate emergency access?

No. The project would not result in inadequate emergency access. All improvements occur within the existing Palm Avenue right-of-way and are intended to calm speeds and organize space, not to restrict access. Targeted lane reductions along certain segments, curb extensions, protected bikeways, and median/separator elements would be designed in coordination with the City's fire and emergency services to maintain required California Fire Code clear widths and turning templates at intersections, alleys, and driveways. Curb extension geometry, separator gaps at crossings, and parking management would be laid out to preserve apparatus turning paths and sight lines and traffic signal modifications would be coordinated with emergency responders to maintain existing emergency operations.

During construction, the contractor would implement a Traffic Management Plan to keep emergency routes open, provide flagging or temporary lane control as needed, and maintain continuous access to adjacent properties. With these design commitments and standard construction-phase measures, the project would not create barriers to emergency response or evacuation; therefore, the impact would be less than significant.

Conclusion

The Palm Avenue Complete Multi-Modal Corridor Project implements complete-streets upgrades within existing right-of-way, including protected bikeways, targeted lane reductions along certain segments, wider sidewalks, ADA curb ramps, curb extensions, parking management, and signal enhancements, all designed consistent with the CA MUTCD and coordinated with City traffic engineering and emergency services. The project does not add general-purpose vehicle capacity and includes standard construction-phase traffic management to maintain access.

Accordingly: (a) it implements, and does not conflict with, applicable City and regional circulation policies (less-than-significant/no conflict); (b) it is consistent with CEQA Guidelines §15064.3(b) because it repurposes capacity and would not induce VMT (less-than-significant); (c) it employs recognized safety countermeasures and avoids hazardous geometry or incompatible uses (less-than-significant); and (d) it maintains required clear widths/turning paths and manages work zones to preserve emergency routes (less-than-significant). Therefore, the Project would have a less-than-significant transportation impact.

