
Appendix J

Responses to Comments

Responses to Comments

This chapter of the Final Mitigated Negative Declaration (MND) for the Palm Avenue Complete Multimodal Corridor project (project) summarizes the comment letters submitted on the Draft MND during the public review period. The comments received did not raise substantive environmental issues regarding the adequacy of the Draft MND; therefore, this chapter provides a summary of each comment and explains why the comment does not require further CEQA analysis or revision to the Draft MND. Table 1 lists all written comment letters received on the Draft MND. Copies of the comment letters are included as attachments to this appendix. Each letter has been assigned an alphanumeric designation for ease of identification and tracking.

Table 1. Comments Received on the MND

Comment Letter Designation	Commenter	Date
Individuals		
I1	Clayton Reppert	May 12, 2026
I2	Anonymous	May 19, 2026
I3	Anonymous	May 19, 2026
I4	Anonymous	May 19, 2026
I5	Anonymous	May 19, 2026
I6	Laura Esquivel	May 19, 2026
I7	John Keating	June 6, 2026

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(619) 423-8311 | (619) 424-2214 direct

jlarios@imperialbeachca.gov | www.ImperialBeachCA.gov

From: Clayton Reppert <clayton.reppert@gmail.com>

Sent: Tuesday, May 12, 2026 7:14 PM

To: Juan Larios <jlarios@imperialbeachca.gov>; Carla Camacho <ccamacho@imperialbeachca.gov>; ibpworks <publicworks@imperialbeachca.gov>; IB Palm Ave. <PalmAve@imperialbeachca.gov>

Cc: Brian Duncan <brian.a.duncan11@gmail.com>

Subject: Stop Sign Request at Palm Ave and Rainbow Dr

CAUTION: This email is from an External source. **DO NOT CLICK** links or attachments unless you recognize the sender and know the content is safe.

Good evening,

I am writing to formally request immediate traffic safety intervention at the pedestrian crossing and intersection located at Palm Avenue and Rainbow Drive in Imperial Beach.

This intersection is an obvious and ongoing public safety hazard. The current traffic controls are inadequate for the volume and speed of vehicles traveling through this corridor.

While Rainbow Drive traffic is controlled by a stop sign, through-traffic on Palm Avenue is not required to stop despite the presence of a marked pedestrian crossing. Although signage indicates a crosswalk, drivers routinely fail to yield to pedestrians. Vehicles regularly travel far above the posted speed limit, often appearing to move at speeds significantly exceeding 30 mph.

In practice, this creates an extremely dangerous crossing environment for pedestrians, cyclists, and vehicles attempting to safely navigate the intersection. The existing design effectively places the burden of safety on us, the pedestrian, while providing no meaningful mechanism to slow or stop high-speed through traffic.

This is not a theoretical concern.

There have been repeated accidents, near-misses, and dangerous traffic conflicts at this location.

My wife and I have almost been hit crossing this intersection multiple times in just the two years we've lived at 564 Dahlia Ave. Additionally, a teammate of mine from the Navy was killed in this area while riding his bicycle home from work after being struck by a vehicle. No one in San Diego should not be dying on their way to work, or for simply crossing the street. This tragedy has made devastatingly clear what many in the community already know: the current traffic controls are insufficient, and the existing conditions are dangerous.

A roadside warning sign alone is not an acceptable safety measure at an active pedestrian crossing on a roadway where speeding and failure-to-yield behavior are routine.

I am requesting immediate evaluation and implementation of meaningful traffic safety measures at Palm Avenue and Rainbow Drive, including one or more of the following:

- Installation of a traffic signal or additional stop control after engineering review
- Raised crosswalk or speed table
- Additional traffic calming measures to reduce speeding at this intersection
- Expedited traffic safety study with public reporting of findings and planned actions

Waiting until additional severe injuries or fatalities occur before taking action would be unacceptable and preventable. Please don't let someone dying or being severely injured be your indicator to implement these changes--- do it now before it's too late.

Please confirm receipt of this request and provide a timeline for review, evaluation, and any planned corrective action.

Sincerely,

Clayton Reppert
[564 Dahlia Ave Imperial Beach CA 91932](#)

Response to Comment Letter I1

Clayton Reppert
May 12, 2026

Clayton's comments describe existing conditions at the Palm Avenue/Rainbow Drive intersection, asserting that current traffic controls are inadequate, vehicles travel at high speeds, drivers fail to yield, and that there have been near-misses and accidents, and requests installation of additional controls such as a signal, stop control, raised crosswalk, or other traffic calming measures. These points fall under existing conditions/safety concerns, traffic operations, and requests for traffic control interventions. Although the comment references safety and serious incidents, it attributes these issues to pre-existing roadway conditions, rather than demonstrating that the proposed project would introduce a new or more severe environmental impact or that the CEQA analysis fails to capture such an impact. The requested actions (signals, speed tables, studies) constitute project design and capital improvement decisions, not CEQA disclosure issues. CEQA evaluates impacts caused by the project, not ongoing deficiencies in the baseline condition or requests for infrastructure upgrades, therefore this comment is properly characterized as a traffic operations and safety improvement request outside the scope of CEQA.

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Comment Card / Tarjeta de Comentarios / Card ng Komento

FLORIDA

~~STREET~~ STREET IS WHERE SOME KIDS CROSS TO GO TO BAYSIDE ELEMENTARY, PLEASE IMPROVE PEDESTRIAN SAFETY

— I LIKE THE NARROWING BUT I THINK HAVING A DEDICATED LEFT TURN SIGNAL + LANE MAKES CROSSING SAFER

PALM
AVE

FLORIDA

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Response to Comment Letter I2

**Anonymous (pedestrian crossing / left-turn lane / Palm Ave sketch)
May 19, 2026**

This commenter raises three distinct points: (1) children crossing Palm Avenue near Bayside Elementary and a request to improve pedestrian safety, (2) support for roadway narrowing, and (3) a recommendation to add a dedicated left-turn lane and signalized left-turn phase to improve crossing conditions. These points fall under traffic engineering and roadway design preferences, specifically intersection control, lane configuration, and pedestrian facility design. While pedestrian safety is a CEQA topic when tied to a potentially significant impact, this comment does not assert that the project would create or worsen a hazardous condition; rather, it suggests an alternative design solution to further improve safety. As such, the comment reflects refinement of engineering design and operational features, not a challenge to the adequacy of the environmental impact analysis, and therefore does not raise a substantive CEQA issue.

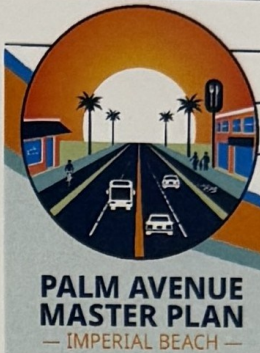
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Comment Card / Tarjeta de Comentarios / Card ng Komento

VERY NICE STAFF

~~TAKING~~ I'VE BEEN HERE 25 YEARS AND THIS IS
JUST ONE MORE STATUS QUD CUT & PART PROJECT
THAT DOESN'T ADDRESS THE UNIQUE CHALLENGES OF IB.
-NO IMMIGRATION-

BUT THANK YOU



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Response to Comment Letter I3

**Anonymous (“Very nice staff... 25 years... concern about cut/paste project... no innovation”)
May 19, 2026**

This commenter states that the project feels like a “cut and paste” design, lacks innovation, and does not reflect the unique character of Imperial Beach despite long-term residency in the area. The points raised fall under urban design character, planning philosophy, and community identity, which are inherently subjective and policy-driven considerations. CEQA does not require that a project be unique, innovative, or tailored in a particular stylistic way; it requires disclosure and analysis of environmental impacts. Because the comment does not identify a specific environmental resource impact, threshold exceedance, or deficiency in the analysis, it constitutes a general opinion regarding project planning approach, not a CEQA issue.

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- How does this sync with RTP projects being considered at tomorrow's Council mtg.?
~~specifically, fiber~~
- And how can proposed bike lanes be incorporated in E Bike Ordinance



**PALM AVENUE
MASTER PLAN**
— IMPERIAL BEACH —

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Response to Comment Letter I4

**Anonymous (RTP coordination + e-bike ordinance)
May 19, 2026**

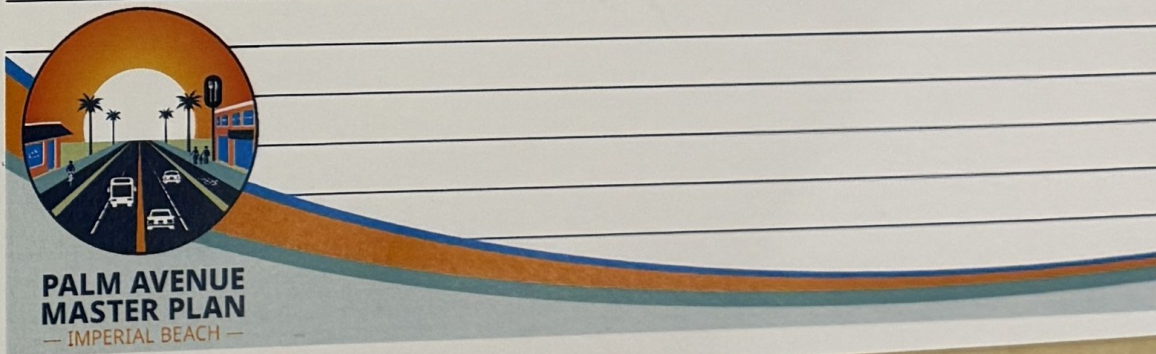
This commenter asks (1) how the project aligns with Regional Transportation Plan (RTP) projects being considered at a City Council meeting and (2) how proposed bicycle lanes will integrate with a local e-bike ordinance. These issues fall under interagency coordination, policy alignment, and regulatory integration, rather than environmental impact analysis. The questions do not allege that the project would cause a significant environmental impact or that the CEQA document fails to analyze one. Instead, they address timing, consistency, and implementation across planning frameworks, which are outside the scope of CEQA. Accordingly, the comment is not CEQA-related.

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Comment Card / Tarjeta de Comentarios / Card ng Komento

Concerned about diverting traffic during construction.

Large truck traffic on Elm.



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Response to Comment Letter I5

**Anonymous (construction traffic diversion / truck traffic)
May 19, 2026**

This commenter expresses concern about (1) traffic diversion during construction and (2) increased large truck traffic on specific streets (e.g., Elm Avenue). These points fall under construction-phase traffic management and logistics. While construction impacts can be analyzed under CEQA, the comment does not identify a specific unaddressed impact, threshold exceedance, or deficiency in the analysis; it provides a generalized concern about temporary conditions that are typically addressed through standard construction traffic control plans and best management practices. As such, the comment is best categorized as a request for additional detail or reassurance regarding temporary operational measures, rather than a substantive CEQA issue.

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Comment Card / Tarjeta de Comentarios / Card ng Komento

Concern about Sewage Problem -

Business are not doing well, people are sick. I.B. has spent millions on buses & bike lanes that



are not a priority compared to Sewage issue affecting us & hurting Business

Laura Esquivel

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Response to Comment Letter I6

Laura Esquivel
May 19, 2026

Laura's comments raise multiple concerns: (1) existing sewage infrastructure problems, (2) public health issues (people getting sick), (3) economic conditions for local businesses, and (4) objection to prioritizing funding for buses and bike lanes over sewer improvements. These points fall under existing infrastructure deficiencies, public policy/funding priorities, and economic conditions. CEQA evaluates environmental impacts caused by the proposed project, not pre-existing problems or how a jurisdiction allocates funding across unrelated infrastructure needs. Laura does not assert that the project would create or exacerbate sewer impacts; rather, they argue that other issues should be prioritized. Therefore, this is outside CEQA scope and constitutes a policy and infrastructure investment concern, not a CEQA issue.

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Cc: John Keating <keating.john.6@gmail.com>

Subject: Comments on the 30% Palm Ave design

CAUTION: This email is from an External source. **DO NOT CLICK** links or attachments unless you recognize the sender and know the content is safe.

Juan,

Attached are my comments on the 30% Palm Ave Design Plan. I'm open to modifications before they become part of the public record.

Regards, John

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June 4, 2026

Mr. Juan Larios
Public Works Director
City of Imperial Beach
825 Imperial Beach Blvd
Imperial Beach, CA 91932

Subject: Comments on the 30% Draft Design Plans for Palm Avenue

Juan,
Outlined below are my comments on the 30% Draft Design Plans for the Palm Avenue Master Plan Project by C+R dated 5/13/2026.

A) Rainbow Drive/Palm Avenue: Ped and bike crossings have been added to the west leg of the intersection, which is good. However, the NB approach retains the current two lanes that can turn left and the associated split signal phasing. This will add about 40 seconds to the cycle length when there is a ped or bike call. A LOS analysis is needed to determine if this added time causes a significant impact. Alternatives should be analyzed. It is suspected that a single NB LT lane with typical LT phasing will be the safest and most efficient.

B) 7th Street/Palm Avenue: A crosswalk on the west leg is not provided, which is the current situation. This is a problem for SB peds and bikers. The southwest corner should be redesigned to remove the EB RT lane and the large striped out area, allowing for a shorter crossing distance and the provision of a crosswalk on the west leg.

Also, the pop-out (bulb-out) at the NE corner results in a departure throat that is too narrow for large vehicles and a full lane offset for NB through drivers.

C) Delaware Street/Palm Avenue: The design presented needs a complete redo. The bicycle path, ped path and raised crosswalk on the north leg are awkward and dangerous. Westbound bicyclists won't have eye contact with WB drivers turning right. Bicyclist won't like they circuitous route and may choose to "take the #2 lane" instead. The raised crosswalk doesn't meet driver expectations as they turn off of Palm Avenue. It also mixes bikers and peds on the raised crosswalk. Where is the SB

limit line? A design similar to other unsignalized intersections on the corridor would be more appropriate.

More needs to be done to discourage/prevent drivers from going straight south across Palm Ave. The north leg is not part of the signalized intersection. The SB approach could be moved westerly and the median on Palm extended easterly.

WB traffic turning from Palm Ave to “Old Palm Ave” currently encounter an awkward turning path. It’s also a pinch point for larger vehicles, like buses. The median nose and dual LT lanes should be moved easterly 20-30 feet.

D) Breakwater Shopping Center Driveway: This driveway is poorly designed. The curb returns allow for higher vehicle speeds before encountering the bike path and the raised crosswalk. This may be the only driveway in the corridor with curb returns this large, a standard driveway apron should be used instead. The raised crosswalk is contrary to driver expectations and doesn’t mitigate the speeds associated with the use of curb returns. It also shouldn’t be used so close to Palm Ave. Where’s the limit line? The bike path and crosswalk should be located adjacent to Palm Ave and treated the same as other driveways in the corridor.

E) 10th Street/Palm Avenue: A traffic signal is preferred over a pedestrian hybrid beacon to allow for corridor signal progression. A ped hybrid beacon is not well understood by many drivers and it would be the only one in the corridor. They are a great tool, but not in this location.

F) Angle Parking west of 11th Street: The five head-in angled parking stalls must be removed. Backing out blind (high profile vehicle parked to the drivers right) into three lanes of traffic is dangerous. Parking for the adjacent businesses could be accomplished by keeping it on-site and if necessary, providing a temporary easement into City R/W until the property is redeveloped. Safety should be the top priority.

Regards,
John Keating
1390 Seacoast Drive, Imperial Beach

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Response to Comment Letter I7

John Keating
June 6, 2026

John raises a series of technical comments on individual intersections along Palm Avenue (Rainbow Drive, 7th Street, Delaware Street, Breakwater driveway, 10th Street, and west of 11th Street), including concerns about lane configurations, signal phasing, level of service (LOS), crosswalk placement, bulb-outs, driveway geometry, raised crosswalk design, vehicle turning movements, and angled parking safety. These issues fall squarely within traffic engineering design, intersection geometry, signal operations, and site-specific safety optimization. While John occasionally references safety and mentions LOS analysis, the comments do not identify a deficiency in the CEQA document's impact analysis (e.g., failure to disclose a significant impact or apply thresholds), but instead recommend preferred design alternatives and refinements (e.g., reducing left-turn lanes, relocating medians, replacing a hybrid beacon with a signal, removing angled parking). Under CEQA, the lead agency is not required to adopt a commenter's preferred engineering solution so long as environmental impacts are adequately analyzed. Accordingly, these comments are best characterized as engineering design critiques and operational preferences, not substantive CEQA issues.

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Conclusion

In conclusion, the comments received on the Draft MND were reviewed and considered by the City. As summarized above, the comment letters primarily address existing roadway conditions, traffic operations, project design preferences, public policy priorities, and requests for additional improvements or coordination. The comments do not identify new or more severe environmental impacts, substantial deficiencies in the Draft MND, or information requiring additional CEQA analysis or revisions to the Draft MND. Accordingly, no changes to the environmental conclusions of the Draft MND are warranted based on the comments received.

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