
Initial Study/Mitigated Negative Declaration

Palm Avenue Complete Multimodal Corridor Project

JULY 2026

Prepared for:

CITY OF IMPERIAL BEACH

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Imperial Beach, California 91932

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
ACM	asbestos-containing material
ADL	aerially deposited lead
ADT	average daily traffic
AERMOD	American Meteorological Society/EPA Regulatory Model
AQMP	air quality management plan
ATP	Active Transportation Program
CAAQS	California Ambient Air Quality Standards
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCC	California Coastal Commission
CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
CEHC	California Essential Habitat Connectivity
CEQA	California Environmental Quality Act
CNEL	Community Noise Equivalent Level
DEHQ	Department of Environmental Health and Quality
DPH	Department of Public Health
DPM	Diesel particulate matter
EIR	Environmental Impact Report
EOC	Emergency Operations Center
EOP	Emergency Operations Plan
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gas
GWP	global warming potential
HAP	hazardous air pollutants
HMBP	Hazardous Material Business Plan
HMCP	Hazardous Materials Contingency Plan
HRA	Health Risk Assessments
IS	Initial Study
ISA	Initial Site Assessment
LCP	Local Coastal Program
LID	Low Impact Development
LRA	Local Responsibility Area
LRSP	Local Road Safety Plan
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act

Acronym/Abbreviation	Definition
MMRP	mitigation monitoring and reporting program
MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone
MT	metric ton
MTS	Metropolitan Transit System
MUTCD	Manual of Uniform Traffic Control Devices
NAAQS	National Ambient Air Quality Standards
NFHL	National Flood Hazard Layer
NOLF	Naval Outlying Landing Field
NPDES	National Pollutant Discharge Elimination System
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Office of Planning and Research
PM	particulate matter
PRIMP	Paleontological Resources Impact Mitigation Program
RAQS	Regional Air Quality Strategy
RCNM	Roadway Construction Noise Model
REC	Recognized environmental conditions
ROW	right-of-way
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SCAQMD	South Coast Air Quality Management District
SCIC	South Coastal Information Center
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDNHM	San Diego Natural History Museum
SDRWQCB	San Diego Regional Water Quality Control Board
SEMS	Standardized Emergency Management System
SPCC	Spill Prevention, Control, and Countermeasure
STC	sound transmission class
SVP	Society of Vertebrate Paleontology
TAC	toxic air contaminants
TWW	treated wood waste
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
VOC	volatile organic compound
WEAP	Workers Environmental Awareness Program
WQIP	Water Quality Improvement Plan

1 Introduction

1.1 Project Corridor Overview and History

Project Overview

The City of Imperial Beach (City), as part of their Capital Improvement Program, has identified a key program objective to develop multimodal improvements to Palm Avenue within the City limits and approximately between Rainbow Drive and Georgia Street. Palm Avenue serves as the primary east-west thoroughfare that bisects Imperial Beach, dividing the City into distinct northern and southern areas. This vital road is integral to the daily lives of City residents, providing access to essential destinations, including schools, parks, healthcare facilities, shopping centers, dining establishments, and more. The proposed improvements (see Chapter 2, Project Description) would provide enhanced connectivity to the Regional Bayshore Bikeway, the 9th Street Enhancement Project and the Border to Bayshore Bikeway Project, thereby offering improved access to destinations through the City and surrounding region.

Consistent with California Environmental Quality Act (CEQA) Guidelines, as described below in Section 1.2, the City has prepared a Final Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Palm Avenue Complete Multimodal Corridor Project (project). The project involves improving the corridor to enhance the experience for all users, increase safety, and improve the overall aesthetics of the area. From a high level, the proposed improvements would include the following:

- Protected Class 4 bicycle facilities with bicycle crossing markings at intersections and driveways;
- Upgrades to existing sidewalks to be a minimum 10' wide and ADA-compliant;
- Upgraded crosswalks and curb ramps to meet ADA standards;
- Replacement of deteriorated curb and gutter;
- Curb extensions on east-west crossings;
- Driveway and alley apron reconstruction;
- Floating parking and bus islands;
- Storm drain assessments and replacement/rehabilitation
- Stormwater management that integrates low impact development strategies and improves drainage;
- Traffic signal modifications;
- Consolidated traffic signal operations for 7th Street and Delaware Street;
- A new traffic signal at 10th Street;
- Utility relocations;
- Private improvement relocations;
- Landscaping and irrigation updates;
- Wayfinding signage and spanning gateway sign; and
- Trees and pedestrian-scale lighting.

Project History

Palm Avenue Corridor Background

Palm Avenue historically functioned as part of State Route (SR) 75, a state highway loop connecting Interstate 5 to Coronado via Imperial Beach and the Silver Strand. Under Caltrans jurisdiction, Palm Avenue served as a principal arterial facilitating regional mobility and access to coastal resources. While under state control, all improvements within the SR-75 right-of-way required Caltrans encroachment permits and compliance with state design standards, limiting the City's ability to implement local streetscape and multimodal enhancements (Caltrans 2018).

Early Planning Efforts

The City of Imperial Beach initiated corridor revitalization planning in 2009 with adoption of the Palm Avenue Mixed-Use & Commercial Corridor Master Plan, followed by community workshops in 2014 and preparation of a Mitigated Negative Declaration (MND) in 2015 (SCH 2015041055) for multimodal improvements along Palm Avenue from Rainbow Drive to Georgia Street. Concurrently, the City implemented water quality projects such as the Palm Avenue Low-Flow Urban Runoff Diversion Project (2010, Clean Beaches Initiative funding) (City of Imperial Beach 2015).

Relinquishment Authority and Process

Legislative Authorization

In 2016, Assembly Bill 1500 (Atkins) amended Streets and Highways Code Section 375, authorizing the California Transportation Commission (CTC) to relinquish SR-75 segments within Imperial Beach upon agreement with Caltrans. The statute required:

- CTC finding that relinquishment is in the state's best interest;
- Continuity of traffic flow; and
- Installation and maintenance of signage directing motorists to the continuation of SR-75.

General relinquishment procedures are governed by Section 73, which stipulates that title and maintenance responsibilities transfer upon recordation of the CTC resolution with the county recorder.

Environmental Documentation

On July 11, 2018, Caltrans filed a Notice of Exemption (SCH 2018078190) for the relinquishment of SR-75 post miles 10.0–11.2 (approximately 1.2 miles of Palm Avenue within City limits), describing the action as a title transfer “as-is” to eliminate state maintenance obligations (Caltrans 2018).

CTC Approval and Recordation

Following CTC approval and recordation with the San Diego County Recorder (2018–2019), Palm Avenue ceased to be a state highway and became a City street. From that date forward, Imperial Beach assumed full ownership, control, and liability for the corridor, subject to statutory obligations for traffic continuity and SR-75 wayfinding signage (California Transportation Commission 2018).

Post-Relinquishment Actions

Relinquishment enabled the City to advance its corridor vision without state route encroachment constraints. Key milestones included:

- Nov 6, 2024: City Council adopted Resolution 2024-083, awarding a Project Approval & Environmental Documentation contract for the Palm Avenue Complete Multimodal Corridor Project (S22109), funded by Active Transportation Program (ATP) Cycle 6 and TransNet Major Corridors grants.
- 2025: City briefings confirmed design progression toward 30% plans, with full design anticipated by 2027 and construction to follow (City of Imperial Beach 2024a).

1.2 California Environmental Quality Act Compliance

The CEQA compliance process applies to proposed projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies. The proposed project constitutes a project as defined by CEQA (California Public Resources Code, Section 21065). The City of Imperial Beach (City) is the CEQA lead agency for the proposed project. Pursuant to CEQA Guidelines Section 15063(d), an Initial Study (IS) must contain the following:

1. A description of the project including the location of the project;
2. An identification of the environmental setting;
3. An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries. The brief explanation may be either through a narrative or a reference to another information source such as an attached map, photographs, or an earlier EIR or negative declaration. A reference to another document should include, where appropriate, a citation to the page or pages where the information is found.
4. A discussion of the ways to mitigate the significant effects identified, if any;
5. An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; and,
6. The name of the person or persons who prepared or participated in the IS.

An IS has been prepared by the City, as the lead agency, in accordance with CEQA Guidelines to evaluate potential environmental effects and to determine whether an Environmental Impact Report, a Negative Declaration, or a Mitigated Negative Declaration (MND) should be prepared for the proposed project. The IS has also been prepared to satisfy CEQA requirements of other agencies that may provide approvals, permits, and/or funding for the proposed project.

In accordance with CEQA Guidelines Section 15369.5, an MND is “prepared for a project when an initial study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the Applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole record before the lead agency that the project, as revised, may have a significant effect on the environment.” The IS for the proposed project determined that the project could cause some potentially significant impacts on the environment, but as

shown in the environmental analysis contained herein, those potentially significant impacts would be reduced to less than significant levels through the implementation of mitigation measures. Consequently, an MND has been prepared for the proposed project.

The City's decision makers must review and consider the MND in its discretion to approve, revise, or deny the project, as appropriate. The MND will serve as the primary environmental document pursuant to CEQA for implementation of the project, including all required discretionary approvals.

This document is organized into the following sections:

Chapter 1, Introduction, introduces and gives context to the project, outlines CEQA compliance and describes the document content and format. Chapter 1 also discusses the public review process and any required mitigation measures.

Chapter 2, Project Setting and Description, describes the existing conditions, surrounding land uses, general plan designations, and existing zoning within the project study area. This chapter also identifies the project location and background and describes the project components in further detail.

Chapter 3, Environmental Impact Analysis, presents an analysis of environmental impacts and the significance finding for each resource topic.

Chapter 4, References and Preparers, provides the list of informational sources used for this IS, and identifies the individuals who prepared and/or contributed to the MND and supporting IS and technical studies as well as their areas of technical specialty.

1.3 Project Planning Setting

The project is located in the City of Imperial Beach and San Diego County; however, the City of Imperial Beach is not within a specific planning area or community in San Diego County (County of San Diego 2011). As such, the project is discussed in the context of the City of Imperial Beach General Plan and Local Coastal Plan (2024b). Additionally, portions of the corridor are located within the coastal zone and are subject to coastal resource regulations.

The project's zoning designations within and around the project corridor include residential (R-1-6000 Single Family Residential, R-3000-D Two-Family Detached Residential, R-2000 Medium Density Residential, and R-1500 High Density Residential), commercial (C/MU-1 General Commercial and Mixed-Use, C/MU-2 Seacoast Commercial and Mixed-Use, SMU/RO Seacoast Mixed-Use/Residential Overlay, and C/R-ET Commercial/Recreation Zone), Public Facility (PF), and Urban Reserve (UR) (City of Imperial Beach 2024b).

From a transportation mobility planning and implementation perspective, the City of Imperial Beach includes portions of the Regional Bayshore Bikeway, the 9th Street Enhancement, and SANDAG's Border to Bayshore Bikeway Projects. As such, the project is discussed in the transportation planning context of the City of Imperial Beach General Plan Circulation Element, City of Imperial Beach Bicycle Transportation Plan, Local Road Safety Plan (LRSP), and the SANDAG Regional Plan. Additionally, the General Plan Circulation Element and Bicycle transportation Plan propose Palm Avenue as a Class I Bike Path west of Rainbow Drive and a Class II Bike Lane along Palm Avenue from Delaware Street to the eastern City limit. The SANDAG 2025 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. Additionally, Palm Avenue in the City of Imperial Beach is within a Regional Mobility Hub Area.

1.4 Public Review Process

In accordance with CEQA and the CEQA Guidelines, a public review period for this IS/MND commenced on May 15, 2026, and concluded on June 15, 2026. The IS/MND was distributed for review to interested and involved public agencies, responsible/trustee agencies, organizations, and private individuals that have requested in writing to be informed of the proposed project. A hardcopy of the IS/MND is also available for public review at the Community Development Counter Monday through Friday, from 7:30 a.m.–9:00 a.m. and 3:30 p.m.–5:00 p.m. or by appointment. The Community Development Counter is located at the following address:

City of Imperial Beach
Community Development Counter
825 Imperial Beach Boulevard
Imperial Beach, California 91932

An electronic copy of the IS/MND can be viewed at www.ibpalmave.com.

In accordance with CEQA Guidelines Section 15073, the IS/MND will be available for public review for not less than 30 days. During the public review period, the public will have the opportunity to provide written comments on the information contained within this IS/MND. The lead agency's discretionary approval/refusal of the proposed project will also be based on the information contained in this document.

In reviewing the IS/MND, interested members of the public should focus on the sufficiency of the document in identifying and analyzing potential project impacts on the environment, as well as the sufficiency of any mitigation measures proposed to reduce potential impacts to a less-than-significant level. Comments on the IS/MND should be submitted by the end of the public review period and must be postmarked by June 15, 2026. Please submit written comments by mail or via email to jlarios@imperialbeachca.gov with the subject line "Palm Avenue Complete Multimodal Corridor Project" to the following address: 495 10th Street, Imperial Beach, CA 91932

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2 Project Description

2.1 Project Location

The project is located in the City of Imperial Beach (City), San Diego County, California (Figure 2-1, Project Location). The project spans approximately 1.75 miles along Palm Avenue, between Rainbow Drive on the west and Georgia Street on the east. The corridor traverses residential, commercial, and institutional land uses and is situated in proximity to regional natural resources, including the San Diego Bay National Wildlife Refuge and the Otay River.

2.2 Environmental Setting

The project corridor (Figure 2-2, Project Site) is located within an urbanized area of Imperial Beach, characterized by a mix of commercial development, residential neighborhoods, schools, and transit-serving uses. The corridor serves as a vital east-west arterial for the community and provides connections to regional transportation initiatives such as the Bayshore Bikeway and the SANDAG Border to Bayshore Project. Environmental features near the project site include the San Diego Bay National Wildlife Refuge and the Otay River, which support sensitive biological habitats. Portions of the corridor are located within the coastal zone and are subject to coastal resource regulations. Existing infrastructure includes sidewalks of varying width, mature landscaping (including invasive palm species), overhead lighting, signalized intersections, and aged drainage systems that are susceptible to localized flooding. The corridor is within FEMA-designated floodplain Zone AE near the Otay River outfall.

2.3 Project Characteristics

The project is designed to transform Palm Avenue into a safer, more accessible, and visually enhanced multimodal corridor. The project would include a variety of infrastructure improvements aimed at supporting all modes of travel, pedestrian, bicycle, transit, and vehicular while enhancing the corridor's overall functionality and aesthetics character. Key improvements would include lane reductions in select segments to calm traffic and increase space for active transportation facilities. Sidewalks would be widened to 10 feet where feasible to improve pedestrian mobility and ADA accessibility, and Class IV protected bike lanes would be installed along portions of the corridor. These bike lanes would be located adjacent to the curb and separated from vehicular traffic by a concrete median and buffer space, where right-of-way allows. Transit facilities would be improved through upgraded or relocated bus stops, including the installation of separated bus islands to improve transit accessibility and reduce conflicts between transportation modes. The project would also involve reconfiguration of on-street parking, minor modifications to driveways and alley entrances, and realignment of certain intersections to improve safety and operational efficiency. Throughout the corridor, protected intersections, high-visibility crosswalks, and ADA-compliant curb ramps would be installed to enhance pedestrian and cyclist safety. Drainage improvements would be a key focus of the project. These would include the rehabilitation, extension, and realignment of storm drain infrastructure to address existing deficiencies and improve system capacity. In areas where grading or ditch constraints exist, perforated pipe systems and retaining walls may be used to support sidewalk widening and ensure effective drainage. The project also evaluated opportunities for multibenefit drainage enhancements, such as water quality treatment and landscape integration, while ensuring compliance with FEMA floodplain requirements near the Otay River. Aesthetics and landscape enhancements are also central to the project design. These would include removal of invasive plant species and installation of drought-tolerant and shade-providing vegetation throughout the corridor. Additional improvements would include decorative paving treatments, pedestrian-scale ornamental

lighting, and new gateway signage at key entry points near Rainbow Drive and Georgia Street. The project would preserve existing landscaping and hardscape features where feasible to minimize disruption and maintain community character. Collectively, these improvements aim to support the corridor's transformation into a safe, attractive, and accessible street for all users, while minimizing impacts to existing properties and integrating with broader regional mobility initiatives.

2.4 Project Construction and Phasing

Construction would be implemented in phases to minimize disruption to the community, including 11 schools within a 2-mile radius. To the extent feasible, construction activities would be scheduled to reduce peak-hour disruptions, including use of off-peak hours, nights, and weekends. Traffic control measures would ensure continued access for emergency responders, transit users, businesses, and residents.

Key staging elements include:

- Phased work zones to maintain open travel lanes
- ADA-compliant pedestrian and bicycle detours
- Temporary bus stop adjustments in coordination with MTS
- Use of signage, flaggers, and speed feedback signs for safety
- Continuous contractor progress requirements during detours

Construction staging would build upon strategies used in similar regional projects, including the Mission Avenue Streetscape and Broadway Rapid Bus Station projects.

2.5 Project Approvals

The project requires various local and regional approvals. Due to its location within the coastal zone and potential to affect sensitive biological resources, a Coastal Development Permit (CDP) would be required. Coordination with regulatory agencies may also be necessary to ensure compliance with federal floodplain requirements (FEMA Zone AE), biological resource protections, and stormwater regulations.

Anticipated discretionary approvals include:

- Coastal Development Permit (City of Imperial Beach)
- Encroachment permits and traffic control approvals
- Stormwater compliance verification consistent with MS4 permit requirements

3 Initial Study Checklist

1. Project title:

Palm Avenue Complete Multimodal Corridor Project

2. Lead agency name and address:

City of Imperial Beach
825 Imperial Beach Boulevard
Imperial Beach, California 91932

3. Contact person and phone number:

Juan Larios, PE, Public Works Director
City of Imperial Beach
Public Works Department
495 10th Street
Imperial Beach, California 91932

4. Project location:

The Palm Avenue Complete Multimodal Corridor Project is located in the City of Imperial Beach (City), San Diego County, California. The project corridor spans approximately 1.3 miles along Palm Avenue (SR-75), beginning at the intersection with Rainbow Drive on the west and extending eastward to Georgia Street.

5. Project sponsor's name and address:

Juan Larios, PE, Public Works Director
City of Imperial Beach
Public Works Department
495 10th Street
Imperial Beach, California 91932

6. General plan designation:

The corridor is designated under the City's General Plan as a combination of commercial and mixed-use classifications including General Commercial, Seacoast Commercial, and Neighborhood Commercial, along with Mixed-Use overlay zones.

7. Zoning:

The City's Zoning Ordinance aligns with the General Plan, applying several key zones to the corridor:

- C/MU-1 (General Commercial and Mixed Use)
- C/MU-2 (Seacoast Commercial and Mixed Use)

- C/MU-3 (Neighborhood Commercial and Mixed Use)
- SMU (Seacoast Mixed Use/Residential Overlay)
- C/R-ET Commercial/Recreation Zone)
- PF (Public Facility)
- R-1-6000 (Single Family Residential)
- R-3000-D (Two-Family Detached Residential R-2000 Medium Density Residential)
- R-1500 (High Density Residential)
- UR (Urban Reserve)

8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):

The project proposes to transform approximately 1.75 miles of Palm Avenue between Rainbow Drive and Georgia Street in the City of Imperial Beach into a context-sensitive, multimodal corridor that improves safety, access, mobility, drainage, and aesthetic character. The project is designed to accommodate all users, including pedestrians, cyclists, transit riders, and motorists, by reconfiguring the existing right-of-way and integrating modern complete-street infrastructure in support of local and regional transportation goals.

The project includes, but is not limited to, the following primary and secondary improvements:

- **Corridor Redesign:** Reduction of travel lanes in select segments to accommodate new Class IV protected bike lanes, widened sidewalks (up to 10 feet where feasible), landscaped medians, and other multimodal features.
- **Intersection Improvements:** Signal modifications at key intersections to enhance pedestrian and bicycle safety, including the addition of fully protected pedestrian phases, accessible curb ramps, and leading pedestrian intervals.
- **Drainage Enhancements:** Rehabilitation, extension, and realignment of storm drain infrastructure, with the addition of perforated pipe systems, integration of multi-benefit green infrastructure, and floodplain compliance measures consistent with FEMA requirements.
- **Transit and Access Upgrades:** Relocation and enhancement of select bus stops, construction of curb extensions, ADA-compliant ramps, and improved alley/driveway access.
- **Streetscape and Landscaping Enhancements:** Installation of shade canopy trees, drought-tolerant landscaping, pedestrian-scale lighting, ornamental fixtures, and gateway signage at project termini.
- **Traffic Operations and Parking:** Realignment of select intersections, adjustments to on-street parking configurations, and incorporation of traffic calming measures to improve corridor operations and safety.
- **Support Infrastructure:** Modifications to utility vaults, signal controller cabinets, and stormwater conveyance facilities, as needed to accommodate corridor improvements.

The project is divided into 11 segments (Segments A through K), each with tailored design considerations based on right-of-way constraints, adjacent land uses, and operational needs. Off-site or secondary actions may include utility relocations, contractor staging, material storage, and temporary lane closures or detours during construction.

Construction would be phased to minimize disruption, particularly in proximity to nearby schools, residential neighborhoods, and commercial centers. A detailed construction staging and traffic control plan would be implemented to maintain access for emergency services, transit, pedestrians, and vehicles throughout the duration of construction.

The project would require discretionary approvals, including a Coastal Development Permit and coordination with the California Coastal Commission. Based on the Proposed Project's proximity to the San Diego National Wildlife Refuge, which is located directly north and east of the project site along the western and eastern limits, coordination with the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, and the Regional Water Quality Control Board, as applicable, will be necessary. The project is consistent with the City's General Plan, Bicycle Master Plan, and Climate Action Plan, and is designed to support regional initiatives including SANDAG's Border to Bayshore Bikeway and 9th Street Active Transportation Enhancements.

9. Surrounding land uses and setting: Briefly describe the project's surroundings:

The project is located within a developed urban area in the City of Imperial Beach, extending approximately 1.75 miles along Palm Avenue between Rainbow Drive and Georgia Street. The corridor is primarily characterized by a mix of commercial, residential, civic, and transportation-oriented land uses.

Land uses adjacent to the corridor include single-family and multifamily residential neighborhoods, local businesses, retail centers, public facilities (including schools and places of worship), and various transit stops served by the Metropolitan Transit System (MTS). The project site is situated within close proximity to several key regional resources, including the San Diego Bay National Wildlife Refuge to the north and the Tijuana River National Estuarine Research Reserve to the south.

Several schools are located within a 2-mile radius, and the corridor serves as a major arterial route for commuters, emergency vehicles, and public transit. The corridor is relatively flat, though select segments feature constrained right-of-way conditions, localized drainage issues, and aging infrastructure. Vegetation within the project site includes ornamental street trees, turf grass, and some non-native or invasive species within medians and parkways.

Given its proximity to coastal and sensitive biological resources, portions of the project site fall within the California Coastal Zone and may be subject to additional regulatory oversight.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

The project may require approvals, permits, or coordination from the following public agencies:

- **California Coastal Commission** – Issuance of a Coastal Development Permit
- **California Department of Transportation (Caltrans)** – If any work encroaches into or affects Caltrans right-of-way, such as traffic signal integration or connections to regional infrastructure.
- **San Diego Regional Water Quality Control Board (RWQCB)** – Compliance with the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit requirements and any necessary stormwater discharge permits.

- **Metropolitan Transit System (MTS)** – Coordination related to bus stop relocations, access improvements, and potential service impacts.
- **City of Imperial Beach** – Local approvals including design review, encroachment permits, traffic control planning, and construction permitting.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

PENDING

Environmental Factors Potentially Affected

The proposed project improvements are to be implemented within the City owned public right-of-way (ROW). The proposed project limits, under existing conditions along the approximate 1.2-mile segment of Palm Avenue, are almost fully developed with a mix of adjacent residential and commercial land uses. Based on these existing conditions and the limits of the proposed improvements, no potentially significant impacts related to agricultural and forestry resources, mineral resources, population and housing, land use and planning, public services, utilities and service systems, recreation, or wildfire are anticipated. The following resource topics, as indicated below, have been analyzed in greater detail, including aesthetics, biological resources, noise, hazardous materials, cultural resources, paleontological resources, air quality, greenhouse gas (GHG), geology and soils, transportation and traffic, and hydrology (floodplain and water quality).

As indicated above, the environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklist on the following pages.

- | | | |
|---|---|--|
| ☒ Aesthetics | ☐ Agriculture and Forestry Resources | ☒ Air Quality |
| ☒ Biological Resources | ☒ Cultural Resources | ☐ Energy |
| ☒ Geology and Soils | ☐ Greenhouse Gas Emissions | ☒ Hazards and Hazardous Materials |
| ☒ Hydrology and Water Quality | ☐ Land Use and Planning | ☐ Mineral Resources |
| ☒ Noise | ☐ Population and Housing | ☐ Public Services |
| ☐ Recreation | ☐ Transportation | ☒ Tribal Cultural Resources |
| ☐ Utilities and Service Systems | ☐ Wildfire | ☒ Mandatory Findings of Significance |

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Would the project have a substantial adverse effect on a scenic vista?

Less than Significant Impact. Palm Avenue is located within an urbanized corridor of Imperial Beach and does not include any scenic vistas within its footprint. While the San Diego Bay National Wildlife Refuge and the Otay River are in proximity to the corridor (of the two, only the San Diego Bay National Wildlife Refuge is clearly visible from Palm Avenue), implementation of the project would not obstruct or degrade existing available views of these resources. Proposed improvements would include Class IV protected bike lanes, widened sidewalks, ADA-compliant curb ramps, high-visibility crosswalks, ornamental lighting, gateway signage, and drought-tolerant landscaping. These features are commonplace along urbanized corridors and would not result in substantial (or noticeable) view blockage or interruption. Furthermore, the project remains entirely within the existing public right-of-way and would not introduce new continuous or isolated structures with vertical height or massing that may block coastal or open space views.

Temporary visual changes during construction, such as views of equipment in staging areas as well as brief lane closures, would be short-term and localized. As such, the project would not remove any scenic viewpoints and would not have a substantial adverse effect on a scenic vista. Impacts would be **less than significant**.

- b) ***Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?***

No Impact. Palm Avenue transitions to Silver Strand Boulevard/SR-75 at the boundary of City of Imperial Beach and City of Coronado limits. The western end of the Proposed Development Footprint along Palm Avenue is located within approximately 500 feet of this City limit boundary and north of the City of Imperial Beach limits, Silver Strand Boulevard/SR-75 is an official designated State Scenic Highway (Caltrans 2025). At the southern end of Silver Strand Boulevard/SR-75 as southbound motorists approach Imperial Beach, the southern extent of the San Diego Bay Wildlife Refuge (i.e., South San Diego Bay Unit) is visible to the southeast and visually, consists of low marshlands intermixed with tidal waters that are viewed against a backdrop of one to three-story residential development.

Despite the presence of scenic resources within the viewshed of southbound motorists on Silver Strand Boulevard/SR-75, implementation of the project would not result in any impacts to the San Diego Bay Wildlife Refuge nor would it impact significant trees, rock outcroppings, or historic buildings. According to Conceptual Design Plans for the project, planned improvements within the western portion of Proposed Development Footprint (near Rainbow Drive) include the introduction of a potential biofiltration area within an existing drainage supporting non-native/invasive vegetation and paralleling the southbound travel lanes, installation of decorative pedestrian or street lights at the existing MTS bus stop present along the northbound travel lanes, high-visibility crosswalks, ADA-compliant curb ramps, striping for a bike lane and dedicated turn lane along the southbound travel lanes, and a modified traffic signal. As none of the planned improvements in the area nearest to Silver Strand Boulevard/SR-75 would damage scenic resources include significant trees, rock outcroppings, or historic buildings, **no impacts** would occur.

- c) ***In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?***

Less than Significant Impact. Pursuant to Section 15387 of the CEQA Guidelines, an “urbanized area” is defined as “a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile.” The project is located within the City of Imperial Beach and is contiguous with the City of Coronado to the north and City of San Diego to the east. As the combined population of Imperial Beach, Coronado, and San Diego is greater than 50,000 persons, the project is considered to be located in an urbanized area.

The proposed development footprint is within the City of Imperial Beach public right-of-way and the visual character of the existing corridor is somewhat typical of a built urban environment. As stated in Section 2.2, Environmental Setting, above, the built corridor is characterized by a mix of commercial development, residential neighborhoods, schools, and transit uses and the roadway itself features striped lanes, signage, landscape and hardscape medians (and landscape parkways and drainage areas), street lighting, and traffic signals. The proposed improvements are compatible with existing development and land uses that line the corridor and installation of improvements of a similar nature would not result in the existing visual character being substantially degraded. Proposed improvements are aimed at supporting all modes of travel, pedestrian, bicycle, transit, and vehicular while enhancing the corridor’s overall functionality and aesthetics character through the provision of cohesive and consistent features. Further, the temporary effects to views and character associated with the phased (or segmented) construction approach including

vehicle, equipment/vehicle, and worker presence along the corridor, and roadway modification would not result in permanent degradation of visual character nor would effects be inconsistent or atypical to other urban corridors in the region. Lastly, the planned improvements to the corridor proposed by the City of Imperial Beach are consistent with the City’s General Plan, Bicycle Master Plan, and Climate Action Plan, and is designed to support regional initiatives including SANDAG’s Border to Bayshore Bikeway and 9th Street Active Transportation Enhancements. Therefore, impacts to existing visual character and quality associated with construction and operation of the project would be **less than significant**.

d) ***Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?***

Less than Significant Impact. The Palm Avenue corridor currently includes standard street lighting and traffic signals typical of multilane roadway within an urbanized environment. The proposed project would introduce new pedestrian-scale ornamental lighting and replace existing median vehicle lighting with decorative fixtures as part of streetscape visual enhancements.

Although the project would introduce new light sources, they would not be highly intense nor introduce new glare. Lighting would be limited in number and lighting sources would be directed downwards to minimize potential spillover and skyglow. The project also does not propose any reflective building materials or surfaces that would generate glare. Temporary lighting associated with construction would be minimal, short-term, and restricted to active work areas. As such, project lighting would not adversely affect any day or nighttime views in the area and impacts would be **less than significant**.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

- a) ***Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

No Impact. The California Department of Conservation's Division of Land Resource Protection works with landowners, local governments, and researchers to conserve California's farmlands and open spaces. The Agricultural Land Mitigation Program, California Farmland Conservancy Program, Williamson Act Contracts, and Farmland Mapping and Monitoring Program are all farmland conservations programs currently in effect and administered by the Division of Land Resource Protection. The City, including the project corridor, is considered entirely urbanized, fully built out, and does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (DOC 2025a) and illustrated on Figure 3.2-1, Important Farmlands. The majority of the area within the City of Imperial Beach, including the project site, contains land designated as Urban and Built-Up Land by the Farmland Mapping and Monitoring Program (see Figure 3.2-1). The project site is urbanized and has limited availability for agricultural use. There are 124.2 acres of Farmland of Local Importance approximately 440 feet north of the project site; however, the project would not encroach into this area or otherwise interfere with any agricultural activities taking place in this area. As such, the project would not result in the conversion of any farmland to non-agricultural use, therefore **no impact** would occur.

- b) ***Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?***

No Impact. Based on a review of the City's Zoning Ordinance and supporting Zoning Map (see Figure 3.2-2, Zoning, of this Final MND), there are no areas within the City, including within or immediately adjacent to the project site, designated for or that allows agricultural uses. The project's zoning designations within and around the project corridor include residential (R-1-6000 Single Family Residential, R-3000-D Two-Family Detached Residential, R-2000 Medium Density Residential, and R-1500 High Density Residential),

commercial (C/MU-1 General Commercial and Mixed-Use, C/MU-2 Seacoast Commercial and Mixed-Use, SMU/RO Seacoast Mixed-Use/Residential Overlay, and C/R-ET Commercial/Recreation Zone), Public Facility (PF), and Urban Reserve (UR) (City of Imperial Beach 2024b). Additionally, there are no lands under Williamson Act contracts within the project corridor or City boundaries (DOC 2024). As such, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. Therefore, **no impact** would occur.

- c) ***Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?***

No Impact. No existing forest land, timberland, or timberland zoned timberland production are located within or near the project site. As discussed above under Section 3.2(b), the project site is located in an urban setting and is highly developed with zoning designations, consistent with residential, commercial, public facility, and urban reserve in place. As such, no conflict with existing zoning for forest land, timberland, or timberland zoned timberland production is expected as a result of the proposed project. **No impact** would occur.

- d) ***Would the project result in the loss of forest land or conversion of forest land to non-forest use?***

No Impact. As stated under Sections 3.2(b) and 3.2(c), the project site is located in an urban setting and is highly developed. Based on a review of the existing and applicable zoning maps (see Figure 3.2-2), the project site's zoning designations include residential, commercial, Public Facility, and Urban Reserve (City of Imperial Beach 2024b). Within the corresponding land uses, no existing forest land is found within or adjacent to the project corridor. As such, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use and **no impact** would occur.

- e) ***Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?***

No Impact. As stated under Sections 3.2(c) and 3.2(d), the project site is located in an urban setting, is highly developed, and there are no areas within the City, including within or adjacent to the project site, designated for or that allows agricultural uses. Based on a review of applicable zoning maps (see Figure 3.2-2), the project site's zoning designations include residential, commercial, Public Facility, and Urban Reserve (City of Imperial Beach 2024b). No existing forest land, farmland or other agricultural uses are found within the City, including within or adjacent to the project corridor. As such, the project would have **no impact** on the conversion of Farmland or forest land to non-agricultural or non-forest uses.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact. The project site is located within the San Diego Air Basin (SDAB), which includes the City of Imperial Beach. The site is also within the jurisdictional boundaries of the San Diego Air Pollution Control District (SDAPCD).

Air districts are delegated with the task of adopting an air quality management plan (AQMP), which is a comprehensive document outlining an air pollution control program for attaining the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The SDAB is designated nonattainment for coarse particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and ozone (O₃) CAAQS and attainment for all NAAQS except for the 2008 federal 8-hour O₃ standard (CARB 2025; EPA 2025). The Regional Air Quality Strategy (RAQS) for the SDAB was initially adopted in 1991 and is updated every 3 years, most recently in 2022 (SDAPCD 2023). The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for O₃. The RAQS relies on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County and the cities in the County, to forecast future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. The California Air Resources Board (CARB) mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the County and the cities in the County as part of the development of their General Plans (SANDAG 2025).

On March 9, 2023, SDAPCD adopted the revised 2022 RAQS for the County. The RAQS demonstrates how the San Diego region will further reduce air pollution emissions to meet state health-based standards for ground-level O₃. The 2022 RAQS guides SDAPCD in deploying tools, strategies, and resources to continue reducing pollutants that are precursors to ground-level O₃, including NO_x and VOC. The 2022 RAQS emphasizes O₃ control measures but also identifies complementary measures and strategies that can reduce emissions of GHGs and particulate matter. It also includes new analyses exploring O₃ and its relationship to public health, mobile sources, under-resourced communities, and greenhouse gases (GHGs) and climate change. Further, the 2022 RAQS identifies strategies to expand SDAPCD regional partnerships, identify more opportunities to engage the public and Communities of Concern, and integrate environmental justice and equity across all proposed measures and strategies.

Regarding particulate matter emissions reduction efforts, in December 2005, SDAPCD prepared a report titled Measures to Reduce Particulate Matter in San Diego County to address implementation of Senate Bill (SB) 656. In the County, SB 656 required additional controls to reduce ambient concentrations of PM₁₀ and PM_{2.5} (SDAPCD 2005). In the report, SDAPCD evaluated the implementation of source-control measures that would reduce particulate matter emissions associated with residential wood combustion; various construction activities including earthmoving, demolition, and grading; bulk material storage and handling; carry-out and track-out removal and cleanup methods; inactive disturbed land; disturbed open areas; unpaved parking lots/staging areas; unpaved roads; and windblown dust (SDAPCD 2005).

As shown in Section 3.3(b) below, the project's emissions of criteria air pollutants would be well below the SDAPCD's regional significance thresholds, which typically set at a value that the air basin can accommodate without affecting the attainment date for the federal or state ambient air quality standards. As such, the project's emissions would not conflict with the RAQS.

According to the General Plan Land Use Element, the project site, as a public road, does not itself have a land use designation. The proposed Palm Avenue improvements would include enhancements to sidewalks, lighting, landscaping, and public amenities and would align with the goals and policies outlined in the General Plan. As the project does not introduce a new or conflicting land use and remains within the scope of the existing purpose, it is considered consistent with the General Plan.

The San Diego Association of Governments (SANDAG) has adopted its 2025 Regional Plan, which identifies goals and measures to improve, among other areas, transportation, transit, air quality, and GHG emissions within the region (SANDAG 2025). The Regional Plan was updated in December 2025, which was the result of years of planning, data analysis, and community engagement to reimagine the San Diego region with a transformative transportation system, a sustainable pattern of growth and development, and innovative demand and management strategies (SANDAG 2025). Appendix F of the 2025 Regional Plan describes the trends in population, housing, and employment. SANDAG's Series 15 Regional Growth Forecast estimated that the City would have a 3.4% decrease in population (892 people) from 2022 to 2050, and a 49.9% increase in employment in the same period, which is an additional 2,533 jobs or approximately 90 jobs per year (SANDAG 2025). Implementation of the project would not result in a change in population or long-term employment. Thus, the project would operate within SANDAG's growth projections. In summary, the project would not obstruct the 2025 Regional Plan, as it would not result in emissions that exceed regional thresholds and would be consistent with the land use designations in the General Plan and aligned with the growth projections and goals outlined in the RTP. The impact is **less than significant**.

b) *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

Less than Significant Impact. Air pollution is largely a cumulative impact, and project-level thresholds of significance for criteria pollutants are used to determine whether a project's individual emissions would have a cumulatively considerable contribution to air quality. If a project's emissions would exceed the SDAPCD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

A quantitative analysis was conducted to determine whether the proposed project might result in emissions of criteria air pollutants that may cause exceedances of the NAAQS or CAAQS, or cumulatively contribute to existing nonattainment of ambient air quality standards. Criteria air pollutants include O₃, nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide, PM₁₀, PM_{2.5}, and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and NO_x, which are important because they are precursors to O₃, as well as CO, sulfur oxides, PM₁₀, and PM_{2.5}.

Regarding NAAQS and CAAQS attainment status,¹ the SDAB is designated as a nonattainment area for federal 8-hour and state O₃ standards as well as state PM₁₀ and PM_{2.5} standards (CARB 2025).

The proposed project would result in emissions of criteria air pollutants for which the CARB and U.S. Environmental Protection Agency have adopted ambient air quality standards (i.e., the NAAQS and CAAQS). Projects that emit these pollutants have the potential to cause, or contribute to, violations of these standards. As part of its air quality permitting process, the SDAPCD has established thresholds in Rule 20.2 requiring the preparation of air quality impact assessments for permitted stationary sources. The SDAPCD sets forth quantitative emission thresholds below which a stationary source would not have a significant impact on ambient air quality. Project-related air quality impacts estimated in this environmental analysis would be considered significant if any of the applicable significance thresholds presented in Table 3.3-1 are exceeded.

¹ An area is designated as in attainment when it is in compliance with the NAAQS and/or the CAAQS. These standards for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare are set by the U.S. Environmental Protection Agency and CARB, respectively. Attainment = meets the standards; attainment/maintenance = achieves the standards after a nonattainment designation; nonattainment = does not meet the standards.

Table 3.3-1. San Diego Air Pollution Control District Air Quality Significance Thresholds

Construction Emissions			
Pollutant	Total Emissions (Pounds per Day)		
Coarse particulate matter (PM ₁₀)	100		
Fine particulate matter (PM _{2.5})	55		
Oxides of nitrogen (NO _x)	250		
Sulfur oxides (SO _x)	250		
Carbon monoxide (CO)	550		
Volatile organic compounds (VOCs)	75 ^a		
Operational Emissions			
Pollutant	Total Emissions		
	Pounds per Hour	Pounds per Day	Tons per Year
Coarse particulate matter (PM ₁₀)	N/A	100	15
Fine particulate matter (PM _{2.5})	N/A	55	10
Oxides of nitrogen (NO _x)	25	250	40
Sulfur oxides (SO _x)	25	250	40
Carbon monoxide (CO)	100	550	100
Lead and lead compounds	N/A	3.2	0.6
Volatile organic compounds (VOCs)	N/A	75 ^a	13.7

Source: SDAPCD 2020.

Notes: N/A = not applicable.

^a VOC threshold based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley as stated in the San Diego County Guidelines for Determining Significance (County of San Diego 2007).

A project would result in a cumulatively considerable net increase for O₃, which is a nonattainment pollutant, if the proposed project's construction or operational emissions would exceed the VOC or NO_x thresholds shown in Table 3.3-1. These emission-based thresholds for O₃ precursors are intended to serve as a surrogate for an O₃ significance threshold (i.e., the potential for adverse O₃ impacts to occur) because O₃ itself is not emitted directly, and the effects of an individual project's emissions of O₃ precursors (i.e., VOCs and NO_x) on O₃ levels in ambient air cannot be determined reliably or meaningfully through air quality models or other quantitative methods.

The California Emissions Estimator Model (CalEEMod) Version 2022.1.1.30 was used to estimate emissions from construction of the project. CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant emissions associated with construction and operational activities from a variety of land use projects, including roadway improvements. The following quantitatively evaluates project-generated construction emissions and impacts that would result from implementation of the proposed project. The construction modeling assumptions and results of the emissions estimates are provided as Appendix A-1, CalEEMod Output Files, to this MND.

Operational activities and associated air quality pollutant sources would be largely similar to the current maintenance of the roadway. The new road improvements would result in no new appreciable sources of air pollutant emissions related to project operations; as such, project operation is qualitatively evaluated.

Construction Emissions

Construction of the proposed project was modeled to begin in December 2025 and extend through July 2027, covering an overall period of approximately 20 months. However, active construction would take place over approximately 215 working days, across six phases. To provide a conservative estimate of criteria air pollutant emissions from construction, all phases of construction were modeled to begin simultaneously in December 2025 and continue for the full length of each phase. While the construction start date is no longer feasible, the construction timeline modeled represents the worst-case scenario for criteria air pollutant emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Construction would include demolition, site preparation, grading, construction of new features, paving, and architectural coating. These construction activities would result in the temporary addition of pollutants to the local airshed caused by on-site sources (e.g., off-road construction equipment, soil disturbance, and VOC off-gassing from architectural coatings and asphalt pavement application) and off-site sources (e.g., vendor trucks, haul trucks, and worker vehicle trips). Specifically, entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM₁₀ and PM_{2.5} emissions. Internal combustion engines used by construction equipment, haul trucks, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOC, NO_x, CO, PM₁₀, and PM_{2.5}. Application of architectural coatings, such as exterior paint and other finishes, and application of asphalt pavement would also produce VOC emissions. Construction emissions can vary substantially from day to day depending on the level of activity; the specific type of operation; and, for dust, the prevailing weather conditions.

Proposed project construction emissions were estimated using a combination of CalEEMod default assumptions and information provided by the City's design team. Grading and earthwork would result in an estimated 24,556 cubic yards of landscaped soil, 648 cubic yards of concrete, and 13,185 cubic yards of asphalt to be exported off site. Construction would also require 565 cubic yards of soil to be imported from off site. The transport of materials to and from the project site would together require 48 daily one-way haul truck trips during the grading phase.

Project construction activity would be required to comply with the applicable SDAPCD rules, including Rule 55 to limit fugitive dust and Rule 67.0.1 pertaining to architectural coatings. The estimated maximum daily construction emissions are summarized in Table 3.3-2. Detailed construction model outputs are presented in Appendix A-1.

Table 3.3-2. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	Pounds per Day					
2025	36.76	34.31	110.10	113.13	0.22	4.42
2026	15.90	13.62	101.36	107.54	0.21	4.00
Maximum Daily Emissions	36.76	34.31	110.10	113.13	0.22	4.42
<i>SDAPCD threshold</i>	75	250	550	250	100	55
Threshold Exceeded?	No	No	No	No	No	No

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; SDAPCD = San Diego Air Pollution Control District.

Summer emissions were not calculated because construction activity was modeled from Winter 2025 through Spring 2026.

The values shown are the maximum summer or winter daily emissions results from CalEEMod. These emissions reflect and account for the required compliance with SDAPCD Rule 55 (Fugitive Dust) and Rule 67.0.1 (Architectural Coatings).

See Appendix A-1 for complete results.

As shown in Table 3.3-2, the proposed project's maximum daily construction emissions would not exceed SDAPCD thresholds for any criteria pollutant, and impacts would be **less than significant**.

Operation

Following the completion of construction, operational activities would remain consistent with the existing scenario. As before, routine maintenance checks may occur; however, the project would not introduce any new sources of emissions (e.g., routine daily equipment operation, vehicle trips, or energy use).

As discussed above, because project operation would be largely similar to the existing scenario, associated emissions are negligible. Therefore, the project would not generate any new emissions beyond the baseline. Operational air quality impacts would be **less than significant**.

c) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Less than Significant Impact with Mitigation Incorporated. Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to CARB, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (CARB 2005). Because Palm Avenue is a mixed-use residential area, homes and other sensitive receptors are located adjacent to the project site.

CO Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed CO "hotspots." CO transport is extremely limited and disperses rapidly with distance from the source. Under certain extreme meteorological conditions, however, CO concentrations near a congested roadway or intersection may reach unhealthy levels affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections operating at an unacceptable level of service (level of

service E or worse is unacceptable). Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots.

Title 40 of the Code of Federal Regulations, Section 93.123(c)(5), Procedures for Determining Localized CO, PM₁₀, and PM_{2.5} Concentrations (Hot-Spot Analysis), states that “CO, PM₁₀, and PM_{2.5} hot-spot analyses are not required to consider construction-related activities, which cause temporary increases in emissions. Each site which is affected by construction-related activities shall be considered separately, using established ‘Guideline’ methods. Temporary increases are defined as those which occur only during the construction phase and last five years or less at any individual site” (40 CFR 93.123). Due to the nature of the project, as an improvement of a major public corridor in the City, construction would be segmented and limited to one section of Palm Avenue at a time, with construction likely to occur overnight. While project construction would involve on-road vehicle trips from trucks and workers during construction, based on the anticipated phasing, construction activities would last no more than approximately 20 months and would not trigger the need for a project-level construction hotspot analysis.

Implementation of the project would result in a less-than-significant transportation impact under the VMT metric, as discussed in Section 3.17, Transportation. Therefore, project-related mobile emissions are not expected to contribute to CO concentrations, and a CO hotspot is not anticipated to occur. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the City is steadily decreasing. The project would result in a less-than-significant impact to air quality regarding potential CO hotspots.

Toxic Air Contaminants

In addition to impacts from criteria pollutants, project impacts may include emissions of pollutants identified by the state and federal government as toxic air contaminants (TACs) or hazardous air pollutants (HAPs). The greatest potential for TAC emissions during construction would be diesel particulate matter (DPM) emissions from heavy equipment operations and heavy-duty trucks, and the associated health impacts to sensitive receptors. The closest sensitive receptors to the project site include single-family residences located along and adjacent to the Palm Avenue project site. As such, a construction HRA was performed for the project, as discussed below. A construction HRA CalEEMod run was performed to estimate on-site emissions of exhaust PM₁₀, which was used as a surrogate for DPM. Construction of the project would occur over a period of 20 months and following completion of construction activities, project-related TAC emissions would cease. It was conservatively assumed that emissions from heavy-duty haul and vendor trucks traveling 0.25 miles would occur on site to represent potential on-site travel and nearby local off-site travel.

Off-road equipment used by potential contractors for the construction of the project is subject to CARB’s In-Use Off-Road Diesel Fueled Fleets Regulation (Off-Road Regulation). The Off-Road Regulation applies to all equipment greater than 25 horsepower; the goal is to reduce particulate matter (PM) and NO_x emissions from in-use (existing) off-road heavy-duty diesel vehicles in California through retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies. The Off-Road regulation prohibited the addition of older vehicles into fleets in January 2014 and the phase out of the oldest and dirtiest engines began in January 2024. Use of off-road heavy-duty construction equipment and on-road diesel trucks are also subject to CARB Airborne Toxics Control Measure to limit idling and reduce DPM.

As stated above, DPM emissions from heavy equipment operations and heavy-duty trucks during construction are the greatest risk for exposure of sensitive receptors to TAC emissions. The construction HRA applies the methodologies prescribed in the Office of Environmental Health Hazard Assessment (OEHHA) document, Air Toxics Hot Spots Program Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessments (OEHHA Guidance Manual) (OEHHA 2015) and the SDAPCD’s Supplemental Guidelines for Submission of Air Toxics “Hot Spots” Program HRAs (SDAPCD 2022). Cancer risk parameters, such as age-sensitivity factors, daily breathing rates, exposure period, fraction of time at home, and cancer potency factors were based on the values and data recommended by OEHHA are implemented in CARB’s Hotspots Analysis and Reporting Program Version 2 (HARP2), which was used to estimate risk from construction activities. Complete model results for the construction HRA are included as Appendix A-2.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. SDAPCD recommends a carcinogenic (cancer) risk threshold of 10 in one million (SDAPCD 2022). A cancer risk of 10 in a million indicates that a person has an additional risk of 10 chances in a million (0.001%) of developing cancer during their lifetime as a result of the air pollution scenario being evaluated, which is minimal and defined as the “No Significant Risk Level” for carcinogens in Proposition 65. Additionally, some TACs increase noncancer health risk due to long-term (chronic) exposures. The Chronic Hazard Index is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system. SDAPCD recommends a Chronic Hazard Index significance threshold of 1.0 (SDAPCD 2022).

The exhaust from diesel engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. DPM has established cancer risk factors and relative exposure values for long-term chronic health hazard impacts. No short-term, acute relative exposure level has been established for DPM; therefore, acute impacts of DPM are not addressed in this assessment.

A dispersion modeling analysis was conducted of DPM emitted from diesel vehicles and construction equipment on the project site for the HRA to assess the health risk impacts of the construction on proximate existing off-site residential receptors. The dispersion modeling was performed using the American Meteorological Society/EPA Regulatory Model (AERMOD), which is a model SDAPCD recommends for atmospheric dispersion of emissions. AERMOD is a steady-state Gaussian plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of surface and elevated sources, building downwash, and simple and complex terrain. Principal parameters of this modeling are presented in Table 3.3-3.

Table 3.3-3. Construction Health Risk Assessment AERMOD Principal Parameters

Parameter	Details
Dispersion model	The air dispersion model used was AERMOD Version 24142, with the Lakes Environmental Software implementation/user interface, AERMOD View, Version 13.0.0. A unit emission rate (1 gram per second [g/s]) was normalized over the line of adjacent volume sources and area sources for the AERMOD run to obtain the X/Q values. X/Q is a dispersion factor that is the average effluent concentration normalized by source strength. It is used as a way to simplify the representation of emissions from many sources. The maximum concentrations were determined for the 1-hour and PERIOD averaging periods.

Table 3.3-3. Construction Health Risk Assessment AERMOD Principal Parameters

Parameter	Details
Meteorological data	The latest 3-year meteorological data (2018–2020) for the Chula Vista station were obtained from SDAPCD as the recommended meteorological station and input to AERMOD.
Urban versus rural option	Urban areas typically have more surface roughness, as well as structures and low-albedo surfaces that absorb more sunlight—and thus more heat—relative to rural areas. Per the SDAPCD guidelines, considering the close proximity to the coastline, rural dispersion coefficients are the modeling default for San Diego County HRAs and were used for this analysis.
Terrain characteristics and elevation data	The elevation of the modeled site is approximately 5 meters above sea level. Digital elevation data were imported into AERMOD, and elevations were assigned to the emission sources and receptors. Digital elevation data were obtained through AERMOD View in the U.S. Geological Survey's National Elevation Dataset format with a 30-meter resolution.
Source release characterizations	Based on EPA methodology, the modeled line-volume sources would result in a release height of 3.4 meters, a plume height of 6.8 meters, and a plume width of 8.6 meters for off-road equipment and diesel trucks (EPA 2015).
Receptors	A nested grid of receptors was placed over the project area, including over residences proximate to the project site, then converted to discrete receptors to accurately revise receptor positioning based on the site.

Source: See Appendix A-2 for additional information.

Notes: AERMOD = American Meteorological Society/EPA Regulatory Model; SDAPCD = San Diego Air Pollution Control District; DPM = diesel particulate matter; CalEEMod = California Emissions Estimator Model; HRA = health risk assessment.

Dispersion model plot files from AERMOD were then imported into CARB's Hotspots Analysis and Reporting Program Version 2 (Version 22118) (HARP2) to determine health risk, which requires peak 1-hour emission rates and annual emission rates for all pollutants for each modeling source. For the residential health risk, the HRA assumes exposure for the sensitive receptors would start in the third trimester of pregnancy, for a duration of 20 months.

Based on results from the HRA, the maximally exposed individual resident off site would be located at residences just north of Palm Avenue on 11th street in the City. Table 3.3-4 summarizes the results of the HRA for project construction, and detailed results are provided in Appendix A-2.

Table 3.3-4. Construction Health Risk Assessment Results - Unmitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximally Exposed Individual Receptors				
Cancer Risk	Per million	50.841	10	Potentially significant
HIC	Not applicable	0.158	1.0	Less than significant

Source: See Appendix A-2.

Notes: CEQA = California Environmental Quality Act; HIC = Chronic Hazard Index.

The results of the HRA demonstrate that the TAC exposure from construction diesel exhaust emissions would result in cancer risk above the 10 in 1 million threshold and the Chronic Hazard Index threshold of less than 1. Therefore, TAC emissions from construction of the project would result in a potentially significant impact before mitigation.

Thus, mitigation would be required to reduce the cancer risk for residential receptors to below the applicable threshold. The project would incorporate Mitigation Measure (MM) AQ-1, as detailed below.

MM-AQ-1 Tier 4 Final Construction Equipment Engines. Prior to the commencement of construction activities for the project, the applicant shall require its construction contractor to use California Air Resources Board (CARB)-certified Tier 4 Final engines for all diesel-powered equipment pieces that are 75 horsepower or greater throughout all phases of construction.

An exemption from this requirement may be granted under the following two conditions:

- (1) The applicant's construction contractor shall demonstrate that at least three construction fleet owners/operations in San Diego County were contacted and that those owners/operations confirmed Tier 4 Final equipment could not be located within San Diego County during the desired construction schedule.
- (2) The proposed replacement equipment has been evaluated using the California Emissions Estimator Model or other industry standard emissions estimation method and documentation has been provided to the City to confirm that the necessary reduction to cancer risk resulting from construction emissions is achieved.

The incorporation of MM-AQ-1 would reduce the emissions resulting from the use of off-road equipment for construction. Table 3.3-5 summarizes the results of the HRA for project construction after the incorporation of MM-AQ-1. Detailed results are provided in Appendix A-2.

Table 3.3-5. Construction Health Risk Assessment Results - Mitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximally Exposed Individual Receptors				
Cancer Risk	Per million	8.82	10	Less than significant
HIC	Not applicable	0.0273	1.0	Less than significant

Source: See Attachment A-2.
Notes: CEQA = California Environmental Quality Act; HIC = Chronic Hazard Index.
The results shown in Table 3.3-5 reflect the implementation of MM-AQ-1.

As shown in Table 3.3-5, the results of the HRA after mitigation demonstrate that the TAC exposure from construction diesel exhaust emissions would result in cancer risk below the 10 in 1 million threshold and the Chronic Hazard Index threshold of less than 1. Therefore, TAC emissions from construction of the project would result in a **less than significant impact after mitigation**.

Health Effects of Criteria Pollutants

Short-term project construction would not exceed the significance thresholds for any criteria air pollutants after implementation of mitigation measures. As stated previously, project operations would not be a significant source of criteria air pollutant emissions.

VOCs and NO_x are precursors to O₃, for which the SDAB is designated as nonattainment with respect to the NAAQS and CAAQS. The health effects associated with O₃ are generally associated with reduced lung function. The contribution of reactive organic gases and NO_x to regional ambient O₃ concentrations is the result of complex photochemistry. The increases in O₃ concentrations in the SDAB due to O₃ precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O₃ concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O₃ CAAQS/NAAQS tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O₃ precursors is speculative due to the lack of quantitative methods to assess this impact. However, the project would not exceed the significance thresholds for VOC or NO_x; therefore, implementation of the project would contribute minimally to regional O₃ concentrations and the associated health effects.

Health effects that result from NO₂ and NO_x include respiratory irritation, which could be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment. However, because project generated NO_x emissions would not exceed the significance threshold during construction or operations, the project would not result in potential health effects associated with NO₂ and NO_x.

CO tends to have a localized impact associated with congested intersections. The associated potential for CO hotspots were discussed previously and are determined to have a less-than-significant impact. Thus, the project's CO emissions would not contribute to significant health effects associated with this pollutant.

Health effects associated with PM₁₀ and PM_{2.5} include premature death and hospitalization, primarily for worsening of respiratory disease. Operation of the project would not exceed the SCAQMD thresholds for PM₁₀ and PM_{2.5}. As such, the project would not have the potential to contribute to exceedances of the NAAQS and CAAQS for PM and obstruct the SCAB from coming into attainment for these pollutants.

In summary, because implementation of the project would not result in exceedances of the SDAPCD evaluation criteria thresholds during construction and operation, the potential health effects associated with criteria air pollutants are considered **less than significant**.

- d) ***Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?***

Less than Significant Impact. Based on available information, the project is not anticipated to result in other emissions that have not been addressed under Section 3.3(a) through Section 3.3(c). As such, this analysis focuses on the potential for the project to generate odors.

SDAPCD Rule 51 (Public Nuisance) prohibits emissions from any source whatsoever in such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to the public health or damage to property. Projects required to obtain permits from SDAPCD are evaluated by SDAPCD staff for potential odor nuisance, and conditions may be applied (or control equipment required) where necessary to prevent occurrence of public nuisance.

Rule 51 also prohibits emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person. A project that proposes a use that would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors. Odor issues are very subjective by the nature of odors themselves and since their measurements are difficult to quantify. As a result, this guideline is qualitative and will focus on the existing and potential surrounding uses and location of sensitive receptors.

The occurrence and severity of potential odor impacts depends on numerous factors: the nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying, cause distress among the public, and generate citizen complaints.

Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be considered less than significant.

Examples of land uses and industrial operations that are commonly associated with odor complaints include agricultural uses, wastewater treatment plants, food processing facilities, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding facilities (SCAQMD 1993). The project entails the renovation of a roadway and would not create any new sources of odors during operation that would affect a substantial number of people. Therefore, the project would result in an odor impact that is **less than significant**.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

This section is based on a Biological Technical Report prepared by Dudek for the proposed project (Appendix B), which evaluated the existing biological conditions and potential impacts to sensitive biological resources associated with the proposed project (project site), and including a 500-foot buffer surrounding the project site (Study Area).

- a) **Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

Less than Significant Impact with Mitigation Incorporated. Plant species with a California Rare Plant Rank (CRPR) 1 or 2, as designated by the CNPS (2025), are considered special-status plant species. Estuary seablite (*Suaeda esteroa*), a CRPR 1 species, has a high potential to occur within the Study Area. Salt marsh bird's-beak (*Chloropyron maritimum* ssp. *maritimum*), a federally endangered, state endangered, and CRPR 1 species, Palmer's Frankenia (*Frankenia palmeri*), a CRPR 2 species, and Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*), a CRPR 1B species, have a moderate potential to occur within the Study Area. While these four special-status plant species were found to have a moderate or high potential to occur in the Study Area, all suitable habitat is present outside of the project boundaries; therefore, no direct impacts to special-status plants are anticipated.

Special-status plants in the areas adjacent to the project site could be indirectly impacted should construction workers or vehicles stray out of the project footprint. Invasive plant species could be introduced by the project during the construction and installation of landscaping that could alter the habitat in the project vicinity. Invasive plants could compete with special-status plants for resources (i.e., water) and space. These indirect impacts could be significant without mitigation. Implementation of MM-BIO-1 and MM-BIO-2 would avoid and minimize these impacts to be less than significant.

One special-status bird species, light-footed Ridgway's rail, was found to have a high potential to occur within the Study Area. Light-footed Ridgway's rail is a federally endangered, state endangered, and CDFW fully protected species. However, no suitable habitat is present within the project site; therefore, this species is not anticipated to be directly impacted by the proposed project. Nonetheless, trees and shrub habitat within the proposed project may provide suitable nesting habitat for bird species protected under the MBTA and California Fish and Game Code. Vegetation removal or grading activities conducted during the general nesting bird season (February 1 through September 30) could result in the direct take of a bird (i.e., individuals, active nests, eggs, or young) if nesting within and immediately adjacent to proposed disturbance areas during construction occur. Harm to or the loss of individuals during construction could be significant, absent mitigation. Direct impacts to special-status birds and nesting birds would be less than significant with the implementation of MM-BIO-3.

Short-term and long-term indirect impacts to special-status wildlife species may include both habitat degradation and effects on individuals. Indirect construction-related impacts may include fugitive dust, runoff, sedimentation, chemical pollution, erosion, litter, accidental clearing, grading, trampling, and attracting predators. These indirect impacts could be significant without mitigation. Implementation of MM-BIO-1 and MM-BIO-2 would reduce indirect impacts to special-status wildlife to **less than significant with mitigation incorporated**.

MM-BIO-1 **Demarcation of Disturbance Limits.** Prior to commencement of earthwork in the undeveloped portion of the project site, the construction limits shall be clearly demarcated (e.g., installation of flagging or temporary high visibility construction fence), as recommended by Biological Monitor. All construction activities including equipment staging and maintenance shall be conducted within the marked disturbance limits to prevent inadvertent disturbance to sensitive vegetation communities outside the limits of work. The flagging shall be maintained throughout construction.

MM-BIO-2 **Invasive Plant Species Prevention.** The project shall not include invasive plant species listed on the California Invasive Plant Council inventory in project landscaping palettes. Project landscape palettes shall be reviewed and approved by the County of San Diego Regional Planning to ensure that invasive plant species are excluded. In addition, to prevent the spread of invasive plant species during construction and until the establishment of common landscaped areas associated with the project (for a period of up to five years): (1) All equipment shall be washed prior to entering and prior to leaving the project site in an upland location where any seed material from invasive species will be contained and (2) All vegetative material removed from the project impact footprint shall be transported in a covered vehicle and will be disposed of at a certified disposal site.

MM-BIO-3 **Nesting Bird Avoidance.** Project construction shall be conducted in compliance with the conditions set forth in the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code to protect active bird/raptor nests. To the maximum extent feasible, vegetation removal shall occur outside of the breeding season for nesting birds (October 1 through January 31) to avoid impacts to nesting birds and raptors. If construction activities must occur during the breeding season for nesting birds (February 1 through September 30), a pre-construction nesting bird survey of the project site and within 500 feet of all impact areas must be conducted to determine the presence/absence of breeding birds and active nests. The nesting bird survey shall be performed by a qualified biologist (more than 3 years of experience of conducting nesting bird surveys) within 72 hours prior to the start of construction in accordance with the MBTA (16 USC 703–712) and California Fish and Game Code Sections 3503, 3503.5, and 3513. If the biologist does not find any active nests within 500 feet of the impact areas, the vegetation clearing/construction work shall be allowed to proceed.

If an active bird nest is found, the nest shall be flagged and mapped on the construction plans along with an appropriate buffer established around the nest, which will be determined by the biologist based on the species' sensitivity to disturbance. The nest area shall be avoided until the nest is vacated and/or the juveniles have fledged. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. On-site nest monitoring shall also be conducted when construction occurs in close proximity to an active nest buffer. No project activities may encroach into established buffers without the consent of a monitoring biologist. The buffer shall remain in place until it is determined the nestlings have fledged and the nest is no longer considered active.

b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Less than Significant Impact. The Study Area is located within a heavily urbanized commercial and residential area dominated by urban/developed land use. Four sensitive vegetation communities were identified within the Study Area, but outside of the project boundaries. Therefore, direct impacts to riparian or sensitive vegetation communities are not anticipated to occur.

Potential temporary indirect impacts could result from construction activities and would include impacts from the generation of fugitive dust and the potential introduction of chemical pollutants (including herbicides). Erosion and chemical pollution (releases of fuel, oil, lubricants, paints, release agents, and other construction materials) may affect wetlands/jurisdictional waters. The release of chemical pollutants can reduce the water quality downstream and degrade adjacent habitats. However, during construction, erosion-control measures would be implemented as part of the Stormwater Pollution Prevention Plan (SWPPP) for the project. Prior to the start of construction activities, the contractor is required to file a Permit Registration Document with the State Water Resources Control Board to obtain coverage under the National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Order No 2009-009-DWQ, NPDES No. CAS000002) or the latest approved general permit. This permit is required for earthwork that results in the disturbance of 1 acre or more of total land area. The required SWPPP will mandate the implementation of best management practices to reduce or eliminate construction-related pollutants in the runoff, including sediment. Therefore, temporary indirect impacts would be **less than significant** due to compliance with above referenced permitting regulations.

- c) ***Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

Less than Significant Impact with Mitigation Incorporated. Although a formal jurisdictional delineation was not performed, the Study Area was inspected for the presence of potentially jurisdictional wetlands and waters. Two swale-like features and one manmade stormwater drainage feature were observed within the western and very eastern portions of the project site (see Figure 3.10-1b and Figure 3.10-1i). A salt marsh is located directly north of the project site along the western and eastern portions of the Study Area. This area is labeled as an estuarine and marine wetland according to the National Wetland Inventory (USFWS 2025). The swale-like feature on the western portion of the Study Area, within the northwest quadrant of the Palm Avenue and Rainbow Drive intersection, will be directly impacted by the proposed project. However, this feature is a manmade round-bottom swale comprised of ornamental and non-native species. In addition, the swale did not contain an obvious ordinary high-water mark or relatively permanent waters (see Figure 3.10-1b). For these reasons, the feature is not expected to be regulated under the Clean Water Act or California Fish and Game Code. However, this feature may be considered a water of the state and could be regulated by the RWQCB, per the Porter-Cologne Water Quality Control Act. Impacts to jurisdictional waters would be significant. However, the project is expected to restore and enhance the feature so there would be no net loss and compensatory mitigation is not warranted. MM-BIO-4 would be implemented to ensure that the project complies with the Porter-Cologne Water Quality Control Act by consulting with the Regional Water Quality Control Board if Waste Discharge Requirements are needed.

Potential temporary indirect impacts could result from construction activities and would include impacts from the generation of fugitive dust and the potential introduction of chemical pollutants (including herbicides). Erosion and chemical pollution (releases of fuel, oil, lubricants, paints, release agents, and other construction materials) may affect wetlands/jurisdictional waters. The release of chemical pollutants can reduce the water quality downstream and degrade adjacent habitats. However, during construction, erosion-control measures would be implemented as part of the Stormwater Pollution Prevention Plan (SWPPP) for the project. Prior to the start of construction activities, the contractor is required to file a Permit

Registration Document with the State Water Resources Control Board to obtain coverage under the National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Order No 2009-009-DWQ, NPDES No. CAS000002) or the latest approved general permit. This permit is required for earthwork that results in the disturbance of 1 acre or more of total land area. The required SWPPP will mandate the implementation of best management practices to reduce or eliminate construction-related pollutants in the runoff, including sediment. Therefore, temporary indirect impacts would be **less than significant with mitigation** and due to compliance with regulations.

MM-BIO-4 Aquatic Resources Mitigation. The project site supports aquatic resources that are jurisdictional under the Regional Water Quality Control Board (RWQCB). Prior to construction activity, the project applicant shall coordinate with the San Diego RWQCB (Region 9) to ensure conformance with the requirements Porter-Cologne Water Quality Control Act and acquire Waste Discharge Requirements if needed and comply with the requirements within the permit.

- d) ***Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

Less than Significant Impact with Mitigation Incorporated. On a regional level, the Study Area does not occur within any designated wildlife corridors or habitat linkages identified in the South Coast Missing Linkages analysis conducted by South Coast Wildlands (2008) or CDFW's California Essential Habitat Connectivity Project (Spencer et al. 2010). The project is adjacent to open space to the north that is expected to facilitate wildlife movement in the region, which would not be impacted by the project. On a local level, the project site does not have any streams that would provide fish passage, and it provides limited connectivity for terrestrial wildlife movement. Therefore, the project site does not function as a wildlife corridor or habitat linkage and does not occur within any designated wildlife corridors or habitat linkages. Direct or indirect impacts to wildlife corridors and habitat connectivity are not anticipated and would therefore be less than significant.

No diagnostic signs of bird rookeries (e.g., numerous nests, whitewash) or large maternal or overwintering bat roosts (e.g., large concentrations of guano or guano odors) were identified in the study area and are not expected. The lack of substantial foraging opportunities for birds on site or in the immediate area makes rookeries unlikely. The lack of typical urban roosting habitat (bridges and older buildings with structural deficiencies) makes it unlikely for the study area to support native bat nursery sites. However, shrub vegetation and trees located within and adjacent to the Study Area provide suitable nesting habitat for birds. Therefore, the project would be required to comply with the MBTA and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code by preventing the disturbance of nesting birds during construction activities. Compliance with the MBTA would ensure that the implementation of the project would not interfere with the nesting of any native bird species. With the implementation of MM-BIO-3, direct and indirect impacts would be **less than significant with mitigation incorporated**.

e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

No Impact. The project would not conflict with any local policies or ordinances that concern biological resources. There would be **no impact**.

f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

No Impact. The project is entirely within the City of Imperial Beach, which is part of the San Diego County MSCP Plan (CDFW 2025), but it has not pursued or obtained authorization to implement the MSCP Plan through an adopted Subarea Plan. The eastern portion of the project site is adjacent to the City of San Diego, which does have an approved MSCP Subarea Plan (City of San Diego 1997). The proposed project is entirely within developed areas and does not change the condition of habitat or open space areas in a manner that would negatively affect the adjacent City of San Diego MSCP conservation areas (i.e., the Multi Habitat Planning Area). Therefore, the project will not conflict with any regional or local habitat conservation framework, including the City of Imperial Beach's General Plan/Local Coastal Program Land Use Plan (City of Imperial Beach 2022a) and the San Diego County MSCP Plan (County of San Diego 1998). Sensitive vegetation as well as lands designated as open space and Areas of Potential Environmentally Sensitive Habitat Area adjacent to the project site would not be directly impacted. As such, the project would not conflict with this threshold, **no impacts** would occur, and no mitigation is required.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

This section is based on the Palm Avenue Complete Multi-Modal Corridor Project - Cultural Resources Inventory and Evaluation Report, prepared for the project by Dudek in July 2025. The report is included as Appendix C to this document.

a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?*

No Impact. The proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. The study area or “area of potential impacts” (API) delineated to analyze the project’s potential impacts on historical resources included built environment resources that were 45 years of age or older (those built in, or prior to, 1980) at the time of the intensive survey in 2025. The horizontal, geographic limits of the API considered areas of direct physical impact within the Palm Avenue roadway corridor and its right-of-way (ROW) from approximately Cypress Avenue at the west end to near Georgia Street at the east end. The API along the roadway corridor from about 9th Street to 13th Street also included one legal parcel to the north and south of the Palm Avenue ROW. In addition to physical impacts, the API also considered potential direct impacts from visual, vibratory, auditory, and atmospheric intrusions, as well as reasonably foreseeable indirect impacts caused by the project that could occur later in time, be farther removed in distance, or be cumulative. The API excluded resources adjacent to the east and west ends of the project corridor that lack characteristics that would make them sensitive to the types of potential effects caused by the project. These resources include buildings directly adjacent to the API that are less than 45 years of age and lack the potential for significance under National Register of Historic Places and California Register of Historical Resources evaluation criteria. Also excluded from the API is a pond associated with the former Western Salt Company Salt Works (P-37-026582) at the western end of the project corridor. Although the pond is directly adjacent to the API, the project proposes no encroachments within this resource or construction activities that could cause a substantial adverse change in the significance of the pond. As such, P-37-026582 was excluded from the API.

The API survey population included 37 previously unevaluated built environment resources that were inventoried and evaluated in accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines using the criteria outlined in Section 5024.1 of the California Public Resources Code and found not to be historical resources for the purposes of CEQA. Because no historical resources were identified within the API, the project would have **no impact** on historical resources.

b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*

Less than Significant Impact with Mitigation Incorporated. A CHRIS database records search, background research, and archaeological pedestrian survey were conducted in support of the CEQA analysis for the project. The CHRIS records search identified 48 previous cultural resources studies within the 1.0-mile search radius surrounding the project study area. Of the 48 studies, 15 intersect the project study area.

The South Coastal Information Center (SCIC) records search identified a total of eight previously recorded cultural resources within the 1.0-mile search radius of the project study area. One historic built environment resource, P-37-026582 (Western Salt Company Salt Works), was identified within this area but outside the area of potential impacts delineated for the project. The remaining seven previously recorded resources consist of four prehistoric resources, two historic resources, and one multicomponent resource.

A review of historic aerials reveals that 90% of the project study area has been previously disturbed and undergone previous ground-disturbing activities, evidenced by the development of Palm Avenue, residential, commercial, and industrial buildings, roadways, and parking lots as early as 1953. However, the depth of ground-disturbing activities is not apparent from the historical aerial photographs or historical topo maps.

During the cultural resources pedestrian survey, one newly recorded historic-age resource, PA-MM-S-001, was identified within the northwestern portion of the project site. PA-MM-S-001 is a large historic-age refuse scatter consisting of more than 1,000 glass and ceramic fragments found on the ground surface. This resource was identified outside of the Palm Avenue right-of-way. Proposed project activities are confined to the Palm Avenue right-of-way so the project will avoid impacts to PA-MM-S-001.

Dudek's cultural resources inventory of the project site indicates that there is a low-to-moderate sensitivity for identifying subsurface cultural resources deposits during project implementation within areas that have not been previously disturbed. The sensitivity metric determination is based on the results of the SCIC records search, the NAHC SLF search, presence of the previously recorded resource, P-37-026582 (Western Salt Company Salt Works) and the newly identified resource, PA-MM-S-001 (historic-age refuse),

Overall, while the potential to encounter subsurface intact deposits within native soils at the depths of ground disturbance required for this project is considered low-to-moderate, there is a possibility for archaeological resources to be encountered during project implementation. For these reasons, a qualified archaeologist and Kumeyaay Native American monitor should be present during all initial ground-disturbing activities where excavation depth would reach native soils to confirm that there are no subsurface deposits. If disturbed sediments (e.g., fill) or other sediments and formations are identified that do not have potential to contain cultural resources, then monitoring may be reduced or terminated. The monitoring program should be performed in accordance with City guidelines and must be directed by a City-qualified archaeologist (Principal Investigator). In the event that unanticipated archaeological resources are encountered during project implementation, impacts to these resources would be potentially significant.

Thus, mitigation is required to address impacts related to the inadvertent discovery of archaeological resources, as outlined in MM-CUL-1, MM-CUL-2, and MM-CUL-3. MM-CUL-1 requires that all project construction personnel participate in a Workers Environmental Awareness Program training for the proper identification and treatment of inadvertent discoveries. MM-CUL-2 requires the retention of an on-call qualified archaeologist to respond and address any inadvertent discoveries, including the retention of a Native American monitor. MM-CUL-3 requires construction work occurring within 100 feet of a cultural resource discovery be immediately halted until the qualified archaeologist, meeting the Secretary of Interior's Professional Qualification Standards for Archaeology, can assess and evaluate the discovery pursuant to CEQA; this measure also outlines the protocols for the final disposition of inadvertent discoveries. Additionally, MM-CUL-3 requires the inadvertent discovery clause be included on all construction plans. With implementation of MM-CUL-1, MM-CUL-2, and MM-CUL-3, significant impacts to archaeological resources would be reduced to **less than significant with mitigation incorporated**.

MM-CUL-1 **Workers Environmental Awareness Program.** Prior to the start of construction activities, all construction personnel and monitors shall be trained regarding identification and treatment protocol for inadvertent discoveries of cultural resources and human remains. A basic presentation and handout or pamphlet shall be prepared in order to ensure proper identification and treatment of inadvertent discoveries of cultural resources and human

remains. The purpose of the Workers Environmental Awareness Program (WEAP) training is to provide specific details on the kinds of materials that may be identified during ground-disturbing activities and explain the importance of and legal basis for the protection of human remains and significant cultural resources. Each worker shall also be trained in the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include but are not limited to work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitoring staff.

MM-CUL-2 **Retention of an On-Call Qualified Archaeologist.** The City shall retain a qualified archaeologist who will be on-call during project construction to respond to and address any inadvertent discoveries identified during ground-disturbing activities, whether within disturbed, imported, or native soils, for the duration of construction activities. Any identified cultural resources shall be assessed and evaluated pursuant to CEQA. A qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards, shall oversee these efforts.

MM-CUL-3 **Inadvertent Discovery Clause.** Should cultural resources (sites, features, or artifacts) be exposed during construction activities for the project, all construction work occurring within 100 feet of the find shall immediately stop, and the qualified archaeologist shall be immediately notified to assess the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, data recovery, or monitoring may be warranted. If it is determined that monitoring is warranted, a qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards, shall oversee and adjust monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits or material. The archaeological monitor shall be responsible for maintaining daily monitoring logs.

c) *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

Less than Significant Impact. No prehistoric or historic-period burials, including those interred outside of formal cemeteries, were identified within the project sites as a result of the CHRIS records search or pedestrian survey. Should human remains be unexpectedly encountered during ground-disturbing activities, they shall be treated consistently with applicable law including, without limitation, Health and Safety Code Section 7050.5, PRC Section 5097.98, and CEQA Guidelines Section 15064.5(e). In accordance with Section 7050.5 of the Health and Safety Code, if human remains are found, the county coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains can occur until the county coroner has determined the appropriate treatment and disposition of the human remains. If the county coroner determines that the remains are, or are believed to be, Native American, the county coroner shall follow all required protocols according to PRC Section 5097.98. Compliance with these regulations would ensure that impacts to human remains resulting from the projects would be **less than significant**.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

- a) ***Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?***

Less than Significant Impact. The following analysis evaluates the potential wasteful, inefficient, or unnecessary consumption of electricity, natural gas, and petroleum-based fuels during construction and/or operation of the project.

Construction Energy Use

Electricity

Electricity consumed during project construction would vary throughout the construction period based on the construction activities being performed. Various construction activities would require electricity, including conveying water that would be used for dust control (supply and conveyance), powering any necessary lighting or electronic equipment, or other construction activities necessitating electrical power. Such electricity demand would be temporary, nominal, and would cease upon the completion of construction. Therefore, the use of electricity during project construction would not be wasteful, inefficient, or unnecessary.

Natural Gas

There would be no natural gas used during construction. Equipment and vehicles would be powered by petroleum-based fuels as discussed below. Therefore, the use of natural gas during project construction would not be wasteful, inefficient, or unnecessary.

Petroleum-Based Fuels

Construction of the project would consume energy resources as a result of the use of heavy-duty construction equipment, on-road delivery and haul trucks, and workers commuting to and from the project site. Petroleum emissions associated with the use of construction equipment and vehicles, which were

used to calculate gallons of petroleum consumed, were calculated using CalEEMod and are provided in Appendix A-1. Fuel consumption from construction equipment was estimated by converting the total carbon dioxide (CO₂) emissions from each construction phase to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. The conversion factor for gasoline is 8.78 kilograms per metric ton (MT) CO₂ per gallon, and the conversion factor for diesel is 10.21 kilograms per MT CO₂ per gallon (The Climate Registry 2025). The estimated fuel usage from construction of the project is shown in Table 3.6-1.

Table 3.6-1. Total Proposed Project Construction Petroleum Demand

Scenario	Off-Road Equipment (diesel)	Haul Trucks (diesel)	Vendor Trucks (diesel)	Worker Vehicles (gasoline)
	Gallons			
Project Construction	38,654	7,075	1,549	5,044
Total Petroleum Consumed for Project Construction				52,322

Source: Appendix A-1.

In summary, construction associated with the development of the project is estimated to consume a total of approximately 52,322 gallons of petroleum. The project would be subject to CARB’s In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and (4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best Achievable Control Technology requirements.

Overall, while construction activities would consume petroleum-based fuels, consumption of such resources would involve temporary activities and would cease upon the completion of construction. Further, the petroleum consumed related to construction would be typical of construction projects of similar types and sizes and would not necessitate new petroleum resources beyond what are typically consumed in California. Therefore, petroleum use during project construction would be temporary and minimal and would not be wasteful or inefficient.

Operational Energy Use

Project operational activities and associated energy consumption sources would be largely similar to the existing conditions. New road improvements associated with project implementation may result in changes to energy demand for lighting; however, new lighting would be subject to Title 24 standards and would not represent a major increase in energy demand from existing conditions. Furthermore, because the project would have a less than significant transportation impact under the VMT metric, it would not result in an increase in fuel consumption from mobile sources compared to existing conditions.

Summary

The project would temporarily increase energy consumption during construction activities related to off-road equipment and vehicle use during material transport and worker trips. However, construction activities would be temporary and would not increase long-term energy or fuel demand. Construction activities would consume the necessary amount of fuel/energy to complete work in an efficient and timely manner. Once operational, the project would not increase energy use above existing conditions.

Accordingly, impacts associated with the potential for the project to result in inefficient, wasteful, or unnecessary consumption of energy during construction and operation would be **less than significant**.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact. As stated above, the proposed project would not represent a long-term source of energy consumption compared to the existing conditions scenario. The proposed project would not conflict or obstruct the City's goals for reducing emissions from energy consumption, as highlighted in its 2019 Local Coastal Program Resilient Imperial Beach Climate Action Plan (City of Imperial Beach 2019). Accordingly, impacts associated with the potential for the project to conflict with or obstruct a state or local plan for renewable energy or energy efficiency would be **less than significant**.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

a) ***Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***

i) ***Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.***

Less than Significant Impact. Earthquake fault zones have been established along known active faults in California in accordance with the Alquist-Priolo Earthquake Fault Zoning Act. The project site is not located within an Alquist Priolo Earthquake Fault Zone (CGS 2011). Like all of Southern California, the project site and surrounding region(s) are subject to potential moderate to strong seismic ground shaking as a result of movement along major regional faults. The nearest active fault is the Silver Strand section of the Newport Inglewood Rose Canyon fault zone, located approximately 1.75 miles west of the project (Kennedy and Tan 2008). This fault has the potential to generate a Magnitude 6.99 seismic event, though the probability of surface rupture at the project site and a result of seismic activity along this fault is considered very low. Project construction is anticipate to maintain and match the existing roadway profile/grades, with minor cuts and fills included. Earthwork is anticipated to consist of site preparation, remedial and fine grading, placement and compaction of backfill, subgrade preparation, pavement construction, stormwater facility improvements, potential relocation of utilities, and installation of new irrigation systems. However, project construction activities, with excavation expected to be shallow (typically 1-2 feet in depth) would not increase or exacerbate the potential for fault rupture to occur. Additionally, no habitable structures are proposed as part of the project that would otherwise require anything beyond standard geotechnical and roadway design practices. Standard site-specific geotechnical investigations (e.g., geotechnical borings) would be conducted, prior to construction, to build upon the completed Geotechnical Materials Special Investigation, inform final implementation, and

ensure safety. The referenced geotechnical materials special investigation is provided in Appendix D. Given the nature of the proposed project improvements and the type of construction activities that would occur, the project would not directly or indirectly increase existing risks of loss, injury, or death associated with a fault rupture and impacts would be **less than significant**.

ii) Strong seismic ground shaking?

Less than Significant Impact. As discussed above, the project is located in a seismically active area within the coastal plains of the Peninsular Ranges Geomorphic Province, which is subject to moderate to strong ground shaking from regional faults. The closest fault includes the Silver Strand section of the Newport Inglewood Rose Canyon fault zone. However, as summarized above, the proposed project's construction activities are expected to involve shallow excavation (typically 1-2 feet in depth) and all proposed improvements would be designed and constructed in accordance with the City's Public Works seismic design standards for highways and roadway features. The proposed project does not include construction of any habitable structures, and no other elements of the proposed project would directly or indirectly result in an increased risks of loss, injury, or death associated with strong seismic ground shaking. Standard geotechnical evaluations would be completed to ensure soil stability. The project will conduct standard site-specific geotechnical investigations to inform design in relation to potential geotechnical hazards, as project designs progress. Therefore, the project would not result in increased adverse effects from seismic ground shaking and impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Seismic related ground failure is a secondary effect of ground shaking and with the results potentially including landslides, liquefaction, lurching, and differential settlement. Liquefaction is the loss of soil strength or stiffness due to a build-up of water pressure from seismic forces ultimately generating various types of ground failures. Liquefaction occurs when saturated and poorly consolidated granular material is shaken during an earthquake and is transformed into a fluid-like state. The project site is mapped (City of San Diego 2008) near areas of high liquefaction potential, with groundwater anticipated between 15 and 30 feet below ground surface (URS 2014). The project would involve improvements to existing roadway features with no substantial landform alterations or grading, limiting the potential for liquefaction induced effects. Due to the relatively level topography of the project site and the shallow level of site grading and ground excavation improvements anticipated, the potential for lateral spreading is considered to be negligible. Standard site-specific geotechnical investigations would be conducted to inform design in relation to potential geotechnical hazards, as project design progresses. Based on the analysis conducted development of the proposed project would not directly or indirectly cause or exacerbate adverse effects involving seismic-related ground failure, such as liquefaction. Impacts would be less than significant.

iv) Landslides?

Less than Significant Impact. The project site is relatively flat, with no mapped landslides (CGS 2011). The western end of the project site is mapped as marginally susceptible to landslides (Tan and Giffen 1995), and according to the Landslide Hazards in the Southern Part of the San Diego Metropolitan Area, the project site is mapped within Area 2, designated as marginally susceptible to landslides. Old alluvial deposits generally have flat lying stratigraphy and no slope modification is proposed within the limits of the

project site. No landform alteration or grading beyond minor excavation is proposed, and all work would occur within the existing paved roadway and landscaped ROW. The project proposes no habitable structures or other structural development intended for human occupancy. In addition, the proposed project would comply with the geotechnical design requirements of City's Public Works Department for highways and roadway features. Additionally, as described above, standard site-specific geotechnical investigations would be conducted to inform design in relation to potential geotechnical hazards, as project design progresses. Given the nature of the proposed improvements, the project would not pose additional threat to existing risks pertaining to landslides and impacts would be less than significant.

b) *Would the project result in substantial soil erosion or the loss of topsoil?*

Less than Significant Impact. Proposed work includes roadway resurfacing, sidewalk/curb reconstruction and limited median adjustments, with minimal grading and excavation expected. Earthwork is anticipated to consist of site preparation, remedial grading, backfill, subgrade preparation, and paved construction (Appendix D). The project does not propose any new alignments or features outside of the existing corridor, only minor landform alteration or grading are proposed (e.g., existing drainage channels), and these modifications would only be improving existing roadway, storm drain, and supporting corridor features. Given the limited nature of proposed project improvements within an existing developed corridor, impacts related to soil erosion or top soil loss would be **less than significant**.

c) *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

Less than Significant Impact. The project's potential impacts related to landslide and liquefaction were previously discussed above in Sections 3.7(a)(iii) and (a)(iv) and are incorporated by reference. Lateral spreading is horizontal or lateral ground movement of relatively flat soil deposits towards a free face or slope such as an excavation, channel, or open body of water. Typically, lateral spreading is associated with liquefaction of one or more subsurface layers near the bottom of the exposed slope. While the project site is underlain by artificial fill, marine beach deposits, alluvial floodplain deposits, and old paralic deposits with expandable or collapsible characteristics (Kennedy and Tan 2008; URS 2014; Appendix D), the presence of these soil types is not expected to materially affect the proposed project improvements. Excavation is expected to be shallow and limited to existing ROW, with no substantial grading or landform modification. Based on the relatively flat topography, project construction would not initiate a landslide or increase the potential for landslides, lateral spreading, subsidence, or collapse to occur. In addition, and as previously referenced, the proposed project would comply with seismic and geotechnical design requirements of Public Works for highways and roadway features. Standard site-specific geotechnical investigations would also be conducted to inform design in relation to potential geotechnical hazards, as project design progresses, including potential remediation requirements during construction. Therefore, potential impacts associated with landslides, lateral spreading, liquefaction, collapse and subsidence would be **less than significant**.

- d) ***Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?***

Less than Significant Impact. Expansive soils are clay-rich soils that shrink when dry and swell when wet. This change in volume can exert substantial pressure on building, roads, and other structures, resulting in structural distress and/or damage. According to the geotechnical evaluation conducted (Appendix D), the subsurface in the project area may include soils with expansive or collapsible characteristics. The actual presence, distribution, and properties of these soils at the site are not yet confirmed, and a site-specific geotechnical investigation would be required during the final design/construction phase to fully evaluate soil conditions. Based on existing regional geologic information and the nature of the proposed project, which would involve roadway resurfacing, median and curb reconstruction, sidewalk improvements, and shallow excavation within the existing paved ROW, any potential expansive or collapsible soils are not expected to materially affect the project or pose a substantial risk to public safety or property. Construction activities are not expected to involve substantial amounts of water such that it could adversely affect the expansive soil. Furthermore, project construction and operation would not increase or exacerbate the potential for soils to expand or contract. Therefore, impacts would be less than significant.

- e) ***Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?***

No Impact. The project does not include the use of septic tanks or alternative wastewater disposal systems. **No impact** would occur.

- f) ***Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

Less than Significant Impact with Mitigation Incorporated. According to surficial geological mapping by Kennedy and Tan (2008) at a 1:100,000 scale and the San Diego Natural History Museum (SDNHM) paleontological records search results, the project alignment is underlain by middle to late Pleistocene (11,700 to 774,000 years ago) old paralic deposits (sedimentary accumulations), unit 6 (old paralic deposits), which are broadly equivalent to the Bay Point Formation (Kennedy 1975 as cited in SDNHM 2025); and a very small portion of recent artificial fill within the northeastern corner of the project. The artificial fill has low paleontological sensitivity; however, the fill may be underlain by a unit with a high paleontological potential (SDNHM 2025). The old paralic deposits, unit 6, underlying the project have high paleontological sensitivity based on recovered well-preserved fossils of marine invertebrates and marine vertebrates from these deposits (SDNHM 2025). However, the project is located within a heavily disturbed, fully built-out corridor. Additionally, no paleontological resources were identified within the project site as a result of a records search with the SDNHM or desktop geological and paleontological review.

Although the entirety of the project limits are heavily disturbed, intact paleontological resources may be present below these previously disturbed areas where older, paleontologically sensitive sediments are anticipated. If intact paleontological resources are located on site, ground-disturbing activities that can reach depths below existing underlying fill and disturbed soils associated with construction of the project, such as excavation of the medians and trenching for utilities, traffic signals, and the gateway sign have the potential to destroy a unique paleontological resource or site. As such, the project site is considered to be potentially sensitive for paleontological resources at depth, and without mitigation, the potential

damage to paleontological resources during construction associated with the project is considered a potentially significant impact. Given the proximity of past fossil discoveries in the surrounding area within Pleistocene deposits, the project site is highly sensitive for supporting paleontological resources below the depth of fill and weathered alluvial deposits. Incorporation of MM-GEO-1, which requires retention of a qualified paleontologist if resources are encountered during construction, would reduce impacts to a level below significance. Therefore, impacts to paleontological resources would be **less than significant with mitigation incorporated**.

MM-GEO-1 Paleontological Monitoring Program. Prior to commencement of any grading activity on site, the applicant shall retain a qualified paleontologist per the 2010 Society of Vertebrate Paleontology (SVP) guidelines. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the project. The PRIMP shall be consistent with the 2010 SVP guidelines and should outline requirements for preconstruction meeting attendance and worker environmental awareness training; where monitoring is required within the proposed project site based on construction plans and/or geotechnical reports; procedures for adequate paleontological monitoring and discoveries treatment; and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. The qualified paleontologist shall attend the preconstruction meeting and a qualified paleontological monitor shall be on site during all rough grading and other significant ground-disturbing activities (including augering) in previously undisturbed, fine-grained Pleistocene old paralic deposits. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will remove the rope and allow grading to recommence in the area of the find.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

a) *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Less than Significant Impact. Greenhouse gases (GHG) are those that absorb infrared radiation (i.e., trap heat) in the Earth's atmosphere. The trapping and buildup of heat in the atmosphere near the Earth's surface (the troposphere) is referred to as the "greenhouse effect" and is a natural process that contributes to the regulation of the Earth's temperature, creating a livable environment on Earth. The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. Human activities that generate and emit GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. This rise in temperature has led to large-scale changes to the Earth's system (e.g., temperature, precipitation, wind patterns), which are collectively referred to as climate change. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include CO₂, methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride (see also CEQA Guidelines Section 15364.5). The primary GHGs that would be emitted by project-related construction and operations include CO₂, CH₄, and N₂O.²

The Intergovernmental Panel on Climate Change developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The reference gas used is CO₂; therefore, GWP-weighted emissions are measured in MT of CO₂ equivalent (CO₂e). The current version of CalEEMod assumes that the GWP for CH₄ is 25 (so emissions of 1 MT of CH₄ are equivalent to emissions of 25 MT of CO₂), and the GWP for N₂O is 298, based on the Intergovernmental Panel on Climate Change's Fourth Assessment Report (IPCC 2007).

Section 15064.7(c) of the CEQA Guidelines specifies that "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." The CEQA Guidelines do not prescribe specific methodologies for performing an assessment, establish specific thresholds of significance, or mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance that are consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009).

As noted above, the CEQA Guidelines provide that a lead agency has discretion to determine, in the context of a particular project, whether to assess significance of GHG emissions impacts using a qualitative or quantitative approach (14 CCR 15064[a]). Quantitative threshold approaches include numeric "bright-line"

² Emissions of hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride are generally associated with industrial activities, including the manufacturing of electrical components and heavy-duty air conditioning units and the insulation of electrical transmission equipment (substations, power lines, and switch gears). Therefore, emissions of these GHGs were not evaluated or estimated in this analysis because the project would not include these activities or components and would not generate hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, or nitrogen trifluoride in measurable quantities.

thresholds or efficiency-based thresholds that express the GHG emissions on a “per capita” or “per service population” (i.e., residents + employees) basis. Several agencies throughout the state have drafted and/or adopted numerical threshold approaches and guidelines for analyzing the significance of project-related GHG emissions, including the South Coast Air Quality Management District’s 3,000 MT CO₂e annual threshold for non-industrial projects (SCAQMD 2010) and the California Air Pollution Control Officers Association 900 MT CO₂e threshold (CAPCOA 2008), among others. However, no numerical thresholds have been formally adopted by an air district or lead agency for use in the San Diego region.

For this analysis, the 3,000 MT CO₂e annual threshold was used as a conservative screening level based on guidance from SCAQMD, which identifies this level as an appropriate significance threshold for all non-industrial projects and provides a defensible basis for determining significance in the absence of locally adopted GHG thresholds. In accordance with SCAQMD guidance, construction emissions were amortized over the life of the project, defined as 30 years, and applied to the operational emissions (SCAQMD 2008).

Construction of the project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road hauling, and vendor (material delivery) trucks, and worker vehicles. GHG emissions associated with temporary construction activity were quantified using CalEEMod, using the assumptions summarized above in Section 3.3, Air Quality, in the subsection Methodology. Table 3.8-1 summarizes the estimated annualized GHG construction emissions associated with the project.

Table 3.8-1. Estimated Annual Construction Greenhouse Gas Emissions

	CO ₂	CH ₄	N ₂ O	R	CO ₂ e
Year	Metric Tons per Year				
2025	263.63	0.01	0.01	0.08	267.10
2026	145.18	0.01	<0.01	0.04	146.73
Total					413.84
<i>Amortized 30-year Emissions</i>					<i>13.79</i>

Source: Attachment A.

Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; R = refrigerant; CO₂e = carbon dioxide equivalent; <0.01 = reported value less than 0.01.

Totals may not add due to rounding.

Total construction-related GHG emissions associated with the project are estimated to be approximately 414 MT CO₂e, which would result in 14 MT CO₂e per year when amortized over 30 years.

As noted earlier, following the completion of construction, the project would not introduce new long-term sources of GHG emissions from operational activities, such as building energy use, vehicle trips, or water consumption. Therefore, only the amortized construction emissions are included in the assessment of the project’s long-term GHG impacts. As such, the project’s GHG emissions profile is limited to the approximately 14 MT CO₂e per year from construction, with no additional long-term emissions to consider. With no amortized construction emissions below, the project’s GHG emissions impact would be below the 3,000 MT CO₂e annual threshold, and impacts would be considered **less than significant**.

b) *Would the project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Less than Significant Impact. This analysis evaluates the project's consistency with applicable GHG reduction plans, policies, or regulations adopted to implement statewide, regional, or local plans for the reduction or mitigation of GHG emissions. Applicable plans are identified as SANDAG's RTP/SCS and the CARB Scoping Plan, which are described below along with an analysis of the project's potential to conflict with the related GHG emission reduction goals in these

Project Potential to Conflict with SANDAG's 2025 Regional Plan

SANDAG's 2025 Regional Plan has been adopted for the purpose of reducing GHG emissions attributable to passenger vehicles in the San Diego region (SANDAG 2025). While the RTP/SCS provides direction for regional growth and transportation patterns under SB 375, it is not directly applicable to the proposed project. As a roadway renovation project that seeks to improve an existing main throughway, it does not introduce new land uses or new long-term sources of GHG emissions compared to the existing baseline. Because the project does not propose or induce growth, it would not conflict with the goals of the SANDAG 2025 Regional Plan directly or indirectly related to reducing GHG emissions. Furthermore, the proposed project would support regional sustainability objectives by enhancing existing infrastructure to improve access to alternative forms of transportation in an important local corridor.

Project Potential to Conflict with State Reduction Targets and CARB's Scoping Plan

The California State Legislature passed the Global Warming Solutions Act of 2006 (AB 32) to provide initial direction to limit California's GHG emissions to 1990 levels by 2020 and initiate the state's long-range climate objectives. Since the passage of AB 32, the state has adopted GHG emissions reduction targets for future years beyond the initial 2020 horizon year. For the proposed project, the relevant GHG emissions reduction targets include those established by SB 32 and AB 1279, which require GHG emissions be reduced to 40% below 1990 levels by 2030, and 85% below 1990 levels by 2045, respectively. In addition, AB 1279 requires the state achieve net zero GHG emissions by no later than 2045 and achieve and maintain net negative GHG emissions thereafter.

As defined by AB 32, CARB is required to develop the Scoping Plan, which provides the framework for actions to achieve the state's GHG emission targets. The Scoping Plan is required to be updated every 5 years and requires CARB and other state agencies to adopt regulations and initiatives that will reduce GHG emissions statewide. The first Scoping Plan was adopted in 2008, and it was updated in 2014, 2017, and most recently in 2022. Although the Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations,³ it is the official framework for the measures and regulations that will be implemented to reduce California's GHG emissions in alignment with the adopted targets. Therefore, a project would be found to not conflict with the statutes if it would meet the Scoping Plan policies and would not impede attainment of the goals therein.

³ The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "the Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009).

CARB's 2017 Scoping Plan update was the first to address the state's strategy for achieving the 2030 GHG reduction target set forth in SB 32 (CARB 2017); the most recent CARB 2022 Scoping Plan update outlines the state's plan to reduce emissions and achieve carbon neutrality by 2045 in alignment with AB 1279 and assesses progress toward the 2030 SB 32 target (CARB 2022). As such, given that SB 32 and AB 1279 are the relevant GHG emission targets, the 2017 and 2022 Scoping Plan updates are the most applicable to the proposed project.

The 2017 Climate Change Scoping Plan Update included measures to promote renewable energy and energy efficiency (including the mandates of SB 350), measures to increase stringency of the Low Carbon Fuel Standard, measures identified in the Mobile Source and Freight Strategies, measures identified in the proposed Short-Lived Climate Pollutant Plan, and measures to increase stringency of SB 375 targets. The 2022 Scoping Plan for Achieving Carbon Neutrality builds upon and accelerates programs currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; and displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines) (CARB 2022).

Many of the measures and programs included in the Scoping Plan would result in the reduction of project-related GHG emissions with no action required at the project-level, including GHG emission reductions through increased energy efficiency and renewable energy production (SB 350), reduction in carbon intensity of transportation fuels (Low Carbon Fuel Standard), and the accelerated efficiency and electrification of the statewide vehicle fleet (Mobile Source Strategy). Given that the proposed project is also not anticipated to result in substantial increase in mobile trips (see Section 3.17), the project would also not conflict with the 2017 Update's goal of reducing GHG emissions through reductions in VMT statewide.

The 2045 carbon neutrality goal required CARB to expand proposed actions in the 2022 update to include those that capture and store carbon in addition to those that reduce anthropogenic sources of GHG emissions. The proposed project would support the state's carbon neutrality goals, as implementation would not include the removal of a large number of trees and would include the addition of approximately 70 trees and other landscaping throughout the project site, which represents opportunities for potential carbon removal and sequestration over the project lifetime. However, the 2022 update emphasizes that reliance on carbon sequestration in the state's natural and working lands will not be sufficient to address residual GHG emissions, and achieving carbon neutrality will require research, development, and deployment of additional methods to capture atmospheric GHG emissions (e.g., mechanical direct air capture). Given that the specific path to neutrality will require development of technologies and programs that are not currently known or available, the project's role in supporting the statewide goal would be speculative and cannot be wholly identified at this time.

Overall, the proposed project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent applicable and required by law. As mentioned above, several Scoping Plan measures would result in reductions of project-related GHG emissions with no action required at the project-level, including those related to energy efficiency, reduced fossil fuel use, and renewable energy production. As demonstrated above, the proposed project would not conflict with CARB's 2017 or 2022 Scoping Plan updates or with the state's ability to achieve the 2030 and 2045 GHG reduction and carbon neutrality goals.

Based on the preceding considerations, the proposed project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions, and impacts would be **less than significant**.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

This hazards and hazardous materials analysis is based on the findings of the following reports:

- Draft Phase I Initial Site Assessment (ISA), Palm Avenue Complete Multimodal Corridor Project, Imperial Beach, California, prepared by Dudek in July 2025 (Phase I ISA; included as Appendix E).
- Phase I Environmental Site Assessment (ESA), West End Gateway District, Right-of-Way Width of the Palm Avenue/State Route 75 Corridor Beginning Approximately 300 feet North of the Intersection Of Rainbow Drive and Ending at 7th Street, Imperial Beach, California, prepared by SCS Engineers in November 2014 (West End Phase I ESA)
- Phase I ESA, East End Gateway District, Right-of-Way Width of the Palm Avenue/State Route 75 Corridor, Florida Street to City Limit, Imperial Beach, California, prepared by SCS Engineers in November 2014 (East End Phase I ESA)
- Phase I ESA, Mid-Town District, Right-of-Way Width of the Palm Avenue/SR-75 Corridor Beginning at 9th Street and Ending at 12th Street, Imperial Beach, California, prepared by SCS Engineers in November 2014 (Mid-Town Phase I ESA)
- Phase I ESA, Park District, Right-of-Way Width of the Palm Avenue/State Route 75 Corridor Beginning at 7th Street and Ending at 9th Street, Imperial Beach, California, prepared by SCS Engineers in November 2014 (Park District Phase I ESA)

These reports identified the following recognized environmental conditions (RECs) and environmental concerns associated with the project corridor.

- Multiple hazardous material release sites were identified along the project corridor that have documented releases of hazardous materials and petroleum products either on or adjoining the project corridor. Contamination from these releases has impacted soil, soil vapor, and/or groundwater. While some of these releases have received regulatory closure, contamination was allowed to remain in place which still poses a potential risk to construction of the proposed project. These sites are shown on Figure 3.9-1, Hazardous Material Sites.
- Multiple historical gas stations and dry cleaners were identified along the project corridor. While documented releases were not noted, these facilities are commonly associated with releases of petroleum products (gas stations) and solvents, such as tetrachloroethylene (PCE), and many of these historical facilities operated prior to placement of environmental regulations. Construction in these areas, specifically excavation into subsurface soils, could result in worker exposure to previously undocumented contamination, and excavated soils may require special handling if contaminated. These historical sites are shown on Figure 3.9-1.
- The project corridor has been used as a roadway since at least 1904. Long-term emissions from leaded gasolines often result in aerially deposited lead (ADL) along high use roadways (such as highways). The presence of ADL may result in elevated lead concentrations in surface soils. Elevated lead concentrations may require special health and safety and handling procedures for soil disposal.
- A review of aerial photographs revealed various types of agricultural activity took place along the project corridor between the 1920s and the 1950s. Agricultural land, specifically irrigated croplands, are often associated with past pesticide use, including organochlorine pesticides, such as DDT, and metals-based pesticides, such as arsenic. Excavation into subsurface soils could result in worker exposure to previously undocumented contamination, and excavated soils may require special handling if contaminated.

- Wooden signposts are located throughout the project corridor. As wooden signposts are traditionally treated with arsenic, chromium, copper, and pentachlorophenol, they must be managed as treated wood waste (TWW). TWW must be handled and disposed of as hazardous waste.
- Concrete culverts are located at the intersection of Palm Avenue and Rainbow Drive. Asbestos-containing material (ACM) may be present in the concrete structure, joint seals, mastic adhesives, weep holes, piping, and other construction materials. Due to ongoing roadway runoff, accumulated sediments in culverts may contain elevated concentrations of volatile organic compounds (VOCs), petroleum hydrocarbons, and metals.
- Electrical equipment located along the project corridor, such as lights, indicators, and switches, may contain mercury or other hazardous materials. If removed and disposed of, special handling procedures may be required.
- Yellow traffic striping installed prior to 2005 likely contains lead chromate and, if removed from the surface of the asphalt, requires special handling and disposal as hazardous waste.
- Several groundwater monitoring wells have been installed along the project corridor within Palm Avenue, specifically to monitor groundwater contamination and remediation under regulatory oversight. According to the Mid-Town Phase I ESA, design plans propose to remove and relocate these monitoring wells to accommodate construction of the project.

a) ***Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

Less than Significant Impact with Mitigation Incorporated. Relatively small amounts of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, adhesive materials, grease, and solvents would be used during construction. These materials are not considered acutely hazardous and are used routinely for construction projects and structural improvements. Further, these materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Consequently, use of these materials for their intended purpose would not pose a significant risk to the public or environment.

Contaminated Sites

Construction would require excavation and grading for utilities and various road improvements, including drainage features. As noted above, four Phase I ESAs were completed on the project corridor in 2014, and one Phase I ISA was completed on the project corridor in 2025, the findings of which indicate the potential for contaminated soils, soil vapor, and groundwater along the project corridor. Figure 3.9-1 shows the locations of known hazardous material release sites and historical gas stations and drycleaners. In addition to these locations, historical agricultural use of the area may have resulted in organochlorine pesticide and arsenic contamination, and long-term use as a roadway may have resulted in lead contamination due to ADL. Excavation and routine transport and disposal of soils as part of construction without appropriate characterization and management procedures could result in a significant hazard to the public or environment (Impact HAZ-1). MM-HAZ-1 requires preparation and implementation of a Hazardous Materials Contingency Plan (HMCP), which would outline procedures for characterization, management, and disposal of contaminated soils; procedures for monitoring soil vapor during excavation and trenching; and procedures for characterizing and handling groundwater, should excavations reach groundwater depth. With these procedures in place, contaminated media would be properly identified and managed, reducing the risk to public or the environment to **less than significant with mitigation incorporated**.

MM-HAZ-1 **Hazardous Materials Contingency Plan.** Prior to the issuance of a grading permit and before earthwork activity or soil disturbance occurs, the project applicant/developer or their designated contractor shall retain a qualified environmental consultant to prepare a hazardous materials contingency plan (HMCP) that outlines (1) the proper screening, handling, characterization, transportation, and disposal procedures for contaminated or potentially contaminated soils on site; (2) monitoring procedures for potentially contaminated soil vapor during excavation and trenching activities; and (3) groundwater characterization and management in the event construction dewatering is required. Contaminated or potentially contaminated soils include those impacted by pesticides during past agricultural use, petroleum hydrocarbons and volatile organic compounds from historical releases and historical gas stations and dry cleaners, and lead-impacted soils from ADL. The SMP shall include:

- Procedures for discovery of contaminated soil, soil characterization, field screening, stockpiling, and sampling soils.
- Procedures and requirements for on-site soil reuse, off-site soil reuse, and off-site soil disposal (landfilling).
- Health and safety, handling, and training procedures for workers who may come in contact with contaminated soils.
- On-site soil management requirements to avoid fugitive dust and stormwater runoff, including stockpile management.
- Response and reporting procedures in the event a release of contaminated soils or violation of air quality or water quality rules occurs (San Diego Air Pollution Control District, San Diego Regional Water Quality Control Board, and/or San Diego Department of Environmental Health and Quality).
- Procedures for the identification, notifications, permitting, handling, abandonment, and disposal of underground storage tanks, piping, sumps, or other features, should any be identified during demolition and construction activities.
- Procedures to meet all applicable federal, state, and local regulations associated with handling, excavating, stockpiling, and disposing of contaminated soils.
- The proposed disposal facility that will accept the contaminated soils and procedures for authorization and transportation.
- Air monitoring procedures for soil screening and breathing zone monitoring in areas of potential volatile organic compound (VOC) contamination during excavation and trenching.
- Procedures for characterization and permitting for groundwater discharge in the event dewatering is needed.

The HMCP will be implemented by the project applicant or their designated contractor for all earthwork activities and activities that have the potential to encounter previously unidentified hazardous materials or wastes on the project site and within off-site disturbance areas.

Groundwater Monitoring Wells

As noted in the Mid-Town Phase I ESA, several groundwater monitoring wells are located within the Palm Avenue right-of-way, which falls within the proposed project corridor. According to the Mid-Town Phase I ESA, project plans include plans to remove and/or relocate monitoring wells within the project corridor to accommodate construction. Prior to any actions taken to move, remove, relocate, or otherwise disturb the monitoring wells, the project applicant must adhere to regulations set forth by County of San Diego Department of Environmental Health and Quality (DEHQ) and San Diego Regional Water Quality Control Board (SDRWQCB). All well activities must be permitted by DEHQ, and changes to any well under regulatory oversight or used for regulatory monitoring must be reviewed and approved by the SDRWQCB. The owner of the wells must also be contacted, as they are legal owners of any monitoring wells they installed. By law, the applicant shall contact the owner of the wells, DEHQ, and SDRWQCB for permits and permissions before any actions are taken to the monitoring wells.

Contaminated Building Materials

Construction of the proposed project would also require removal of signposts, existing electrical equipment, yellow traffic striping, and stormwater culverts and catch basins. As noted in the Phase I ESAs and Phase I ISA, there is a potential for hazardous materials to be present in all of these features. As such, routine demolition and disposal could result in releases of hazardous materials if not properly identified and managed (Impact HAZ-2). Prior to any demolition or construction activities, the project corridor would undergo a hazardous materials assessment as described in MM-HAZ-2 to identify TWW, mercury-containing electrical equipment, lead chromate paint (yellow traffic striping), asbestos, and contaminated sediments. Once identified, MM-HAZ-2 also requires the construction contractor to follow appropriate abatement procedures to remove hazardous materials as part of construction.

MM-HAZ-2 Hazardous Materials Building Survey and Abatement. Prior to demolition or renovation activities, a hazardous building materials survey shall be conducted by a California Department of Public Health (DPH) Certified Asbestos Consultant and/or Certified Site Surveillance Technician and a California DPH Certified Lead Inspector/Risk Assessor or Sampling Technician. The survey will include asbestos in culverts, lead chromate in applicable yellow traffic striping, electrical equipment, treated wood waste, and contaminated sediments in culverts and catch basins scheduled for removal. A report documenting material types, conditions and general quantities will be provided, along with documentation of positive materials and diagrams. Demolition and construction plans and contract specifications shall incorporate any abatement procedures for the removal of material containing hazardous materials. All abatement work shall be done in accordance with federal, state, and local regulations, including those of the Environmental Protection Agency (which regulates disposal), Department of Toxic Substances Control, Occupational Safety and Health Administration and California Occupational Safety and Health Administration (which regulates employee exposure), and the San Diego Air Quality Management District.

Once construction has been completed, fuels and other petroleum products will no longer remain within the work area. Operation of the proposed project would not vary from current use, which is a public right-of-way, and would not require the routine transport, use, storage, or disposal of hazardous substances for continued

operation. It should be noted that, as a State Route, Palm Avenue is routinely traversed by vehicles carrying commonly used hazardous substances. However, the project would not alter, affect, or otherwise increase the use or transport of such materials. Impacts would be **less than significant with mitigation**.

b) *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Less than Significant Impact with Mitigation Incorporated. As discussed in Section 3.9(a), hazardous materials used during construction of the proposed project would be relatively small and would not be acutely hazardous. Should quantities of hazardous materials be stored within the project corridor during construction, such as diesel fuel or oils, secondary containment would be used and spill kits with adequate response volume would be maintained in the materials storage area. The project would also be subject to hazardous material handling regulations, including preparation of a Hazardous Material Business Plan (HMBP) under HSC Chapter 20 Sections 25500 to 25519 and CCR Title 19 Sections 5010.1 to 5040.2 and a Spill Prevention, Control, and Countermeasure (SPCC) Plan under 40 CFR 112. These plans both require emergency response procedures be established and training be completed on a regular basis for hazardous material and petroleum product handling, and submit the site to regulatory inspection. Therefore, the potential for upset or accident condition due to a release of hazardous materials used during site construction would be low.

Also discussed under 3.9(a), construction has the potential to encounter contaminated soil, soil vapor, and/or groundwater, which, if not appropriately managed, could result in significant impact due to upset/accident condition involving a release of contaminated media (Impact HAZ-3). MM-HAZ-1 requires implementation of an HMCP, which, as discussed above, would outline and implement procedures for characterization, handling, and disposal of contaminated soil, monitoring of potentially contaminated soil vapor, and dewatering in potentially contaminated areas, as needed. This would apply to releases from past commercial/industrial operations (gas stations, dry cleaners, and regulatory cleanup sites shown on Figure 3.9-1), and would apply to possible contaminants due to ADL and past agricultural use. Once characterized and properly managed with implementation of MM-HAZ-1, the chance for upset or accident conditions would be reduced to a less than significant level.

Construction of the proposed project also has the potential to encounter hazardous building materials, such as asbestos, lead chromate paint, TWW, and electrical equipment. Improper handling of these materials could result in an upset/accident condition, releasing hazardous materials to the environment (Impact HAZ-4). MM-HAZ-2 requires proper identification of these materials and development and implementation of an abatement plan, which would be implemented during project construction. The chance for upset or accident conditions would be reduced to a **less than significant level with mitigation incorporated**.

Operation of the proposed project would not change current use as a public ROW. Subsurface impacts, including contaminated soil, soil vapor, and groundwater, would be paved over and not likely be encountered during operation. Lead- and asbestos-impacted materials and TWW would be removed during project construction. Remaining lead-impacted materials and TWW would be located within the project features (signposts, traffic striping) and would not likely be impacted by future project operation. Therefore, potential risks associated with the above-mentioned potentially hazardous materials would be limited to construction.

- c) ***Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

Less than Significant Impact with Mitigation Incorporated. There are two existing K-12 schools and no proposed schools located within 0.25 miles of the proposed project (GreenInfo 2021; CDE 2025), Bayside STEAM Academy at 490 Emory Street and Imperial Beach Charter at 650 Imperial Beach Boulevard are both 0.25 miles from the project corridor at its nearest point. As discussed in Section 3.9(a), project construction would involve relatively small amounts of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, grease, adhesive materials, and solvents. In the event of an accidental release of fuels, oils, lubricants, or other hazardous materials associated with construction, hazardous emissions could occur within 0.25 miles of a school. However, all spills would be quickly contained and cleaned up pursuant to federal, state, and local laws. Potential effects would only occur during construction activities, which would be temporary and localized. Hazardous substances would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Use of these materials for their intended purpose and in accordance with applicable safety laws would not pose a significant risk to nearby schools. Also discussed in Section 3.9(a) and 3.9(b) implementation of MM-HAZ-1 and MM-HAZ-2, together with standard best practices and applicable regulations, would prevent upset or accident conditions involving the release of hazardous materials during construction of the proposed project. Operation of the proposed project would be used within the existing public ROW and would not change the current operational characteristics or adjacent land uses. Operation of the proposed project would not require the use, storage, or disposal of hazardous substances. Impacts would therefore be **less than significant with mitigation incorporated**.

- d) ***Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?***

Less Than Significant Impact with Mitigation Incorporated. The environmental regulatory database search conducted as part of the Phase I ESAs and Phase I ISA included a search of Cortese List databases. Numerous contaminated sites, including Leaking Underground Storage Tank (LUST) sites, which are listed pursuant to Government Code Section 65962.5, were identified adjacent to the proposed project and are shown on Figure 3.9-1. As discussed in Sections 3.9(a) and 3.9(b), known and potential impacts associated with these sites include contaminated soil, soil vapor, and groundwater. However, an HMCP would be prepared under MM-HAZ-1, which would ensure that any impacts associated with the LUST sites identified in Figure 3.9-1 would be less than significant

Operation of the proposed project would be within the existing public ROW and would not change the current use. Subsurface impacts associated with these Cortese List sites would be paved over and not be encountered during operation. Therefore, potential risks associated with hazardous materials sites would be limited to the construction phase and would remain **less than significant with mitigation**.

- e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

No Impact. The proposed project is not located within an airport land use plan, nor is it located within two miles of a public use airport. Therefore, **no impacts** would occur, which would result in a safety hazard or excessive noise for people residing or working in the project area.

- f) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Less than Significant Impact. San Diego County's Office of Emergency Preparedness, or Alert San Diego, is responsible for organizing emergency preparedness, response, and evacuation plans. In addition, the County designates disaster routes (County of San Diego n.d.). The tsunami evaluation zone map for the project corridor area identifies Palm Avenue as a primary evacuation route. No complete road closures of Palm Avenue would occur during construction activities. As discussed further in Section 3.17, the contractor would implement a Traffic Management Plan during construction 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**.

- g) *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

Less than Significant Impact. As further discussed in Section 3.20, Wildfire, the project corridor is located within an urbanized area of the City that is without significant slopes and is bordered to the north by the San Diego Bay National Wildlife Refuge and the Otay River. Also, the project corridor does not fall within a fire hazard severity area, but is surrounded by Federal Responsibility Area with moderate to high fire hazard severity zones (CAL FIRE 2025). Finally, the project corridor does not include topography or slope variations that would create unusual weather conditions, such as high wind velocities, which would lead to increased fire risk. During construction, implementing standard best practices such as the restriction or suspension of construction activities that could generate sparks or heat on these days would reduce the risk of wildfire. Operation of the proposed project would not substantially change from current conditions; therefore, the operation of the project would not substantially result in increased wildfire risks, and impacts would be **less than significant**.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Existing drainage along Palm Avenue includes sheet flow, gutter flow, and several independent storm drain systems, all discharging to Otay River. There is generally a crown along the center of the Palm Avenue roadway, which provides for sheet flow off the road into the adjoining gutter system. At the western limits of the project near Rainbow Drive there are open drainage channels paralleling the roadway on the western side. Runoff from the proposed project will continue to discharge into the Otay River near its headwaters discharge point into the San Diego Bay. The City's existing storm drain systems, as described in the Palm Avenue Multimodal Corridor Improvements,

Preliminary Hydrology and Hydraulics Report (Appendix F) include a letter designation nomenclature, and those existing systems, specifically drainages D, H, K, and P, will continue to receive all of the runoff from the project area. The intent of the proposed project improvements and the integration of those improvements as part of the drainage system is to closely mimic the existing drainage patterns. However, since this is an urban retrofit project, the drainage design is not expected to meet new development standards. The project also proposes to convert existing open trapezoidal drainage channels, located along the northwestern limits of the project, south of Rainbow Drive (see Figure 3.10-1a, 3.10-1b, and 3.10-1c), into an enclosed culvert system with the existing channels filled up to grade with the roadway profile. The less-than-significant impacts associated with this proposed project feature are discussed in Section 3.4, Biological Resources. The project also proposes minor impacts to an existing drainage inlet and outlet at the eastern limits of Palm Avenue, on both the south and north sides of the road, respectively. The areas immediately adjacent to the inlet and outlet will involve some ground-disturbing activities; however, the impacts would be temporary and the areas will be fully restored (see Section 3.4).

a) *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

Less than Significant Impact. A significant impact would occur if the proposed project would discharge water that did not meet the water quality standards established by the SWRCB National Pollutant Discharge Elimination System (NPDES) and waste discharge requirement permit programs, and the San Diego RWQCB's San Diego Region Basin Plan for the Coastal Watersheds of San Diego County (SDWB 2011). Consistent with the analysis provided in the preliminary hydrology and hydraulics report (Appendix F), the City has significant coastal groundwater issues caused by sea level rise and high tides, leading to localized flooding and potentially impacting infrastructure. The current groundwater scenario is also influenced by issues related to rising sea levels and solutions to prevent flooding and coastal erosion, such as efforts to forecast and manage high groundwater levels are needed.

The City is subject to and compliant with the requirements of the Regional Phase I MS4 Permit (Order No. R9-2013-0001, as amended by Order Nos. R9-2015-001 and R9-2015-0100. The City's BMP Design Manual outlines the requirements and how they impact development projects. BMPs would be implemented during construction pursuant to the State Water Resources Control Board Water Quality Order No. 99-08-DWQ (General Construction Permit) through the preparation of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP will be prepared consistent with the SWRCB Order No. 2009-0008-DWQ NPDES General Permit No. CAS00002 (Construction General Permit), amended by Order No. 2010-0014-DWQ and Order No. 2012-0006-DWQ, and implemented during project construction. Through implementation of a SWPPP and stormwater BMPs, the potential for polluted runoff associated with construction activities would be minimized. Additionally, the project would implement Green Street measures as part of the overall compliance approach.

As referenced above, the general intent of the proposed project is to maintain the existing drainage function and improve the function where feasible, including upsizing the undersized pipes identified during preliminary analysis (Appendix F). During operation, the proposed project would comply with the latest San Diego County Public Works Low Impact Development (LID) Standards Manual (County of San Diego 2014), and the City's BMP Design Manual (City of Imperial Beach 2018). The LID Standards Manual and City's BMP Design Manual provide guidance for the implementation of stormwater quality control measures in new projects with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges. Additionally, the project would adhere to the California

Coastal Commission (CCC) Coastal Act and the City's certified Local Coastal Program (LCP), which requires consistency with the LCP's policies to protect water quality from impacts of construction and long-term development (City of Imperial Beach 2019). The project design includes assessment of and potential improvement to the existing drainage system and will incorporate stormwater treatment infrastructure and runoff prevention measures, where applicable. Construction plans and CEQA document conditions of approval, would also include detailed BMPs that would avoid and minimize water pollution to the extent feasible. With implementation of regulatory requirements and BMPs, the potential for discharge of pollutants to surface waters or groundwater would be minimized. Therefore, the proposed project would not violate any water quality standard or waste discharge requirement during construction or operation and impacts to water quality standards would be **less than significant**.

b) *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Less than Significant Impact. The project is currently developed as a major roadway consisting of impervious surfaces throughout the project area along Palm Avenue. Project implementation would involve lane reductions, widening sidewalks, installing Class IV protected bike lanes, upgraded or relocated bus stops, reconfiguration of on-street parking, minor modifications to driveways and alley entrances, realignment of certain intersections to improve safety and operational efficiency (see Figure 3.10-1, Proposed Intersection Improvements), the installation of protected intersections, high-visibility crosswalks, and ADA-compliant curb ramps, drainage improvements/enhancements, and various aesthetic and landscape enhancements. These changes would not result in negative changes from the existing paved surface areas. Slight increases in impervious areas may occur due to the construction of wider sidewalks, bus platforms, and curb bulb outs. As the project progresses, landscaping and BMPs would be strategically placed to offset the impact of the additional impervious area that may be added. As such, the project would not negatively interfere with stormwater infiltration or groundwater recharge. Additionally, the project would not require the use of groundwater for any construction or operational water needs. Any water use required as part of construction activities would be obtained from other public or private sources (e.g., mobile water trucks). The existing conditions of the project site are paved surfaces and minor landscaping. Conditions at the site would be similar after project implementation. Additionally, there are no active wells within the vicinity of the project, and thus no subsurface resource activities, which would otherwise affect groundwater resources or recharge capacity through project implementation (CalGEM 2025). The project site is near the Pacific Ocean and has very little runoff infiltrating to the ground. The project would improve conditions by adding landscaping and constructing BMPs. As such, the project would not significantly change groundwater quantities or result in substantial losses to groundwater recharge capability, and impacts would be **less than significant**.

c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

- i) *Result in substantial erosion or siltation on- or off-site?***
- ii) *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?***

iii) ***Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?***

iv) ***Impede or redirect flood flows?***

Less than Significant Impact. The project improvements would not substantially alter the existing drainage pattern. The proposed drainage pattern would closely mimic existing conditions, as demonstrated in the drainage calculations provided in Appendix F. Outfall pipe runoff rates are expected to remain consistent with existing conditions, and rip rap will continue to provide erosion control and flow dissipation. The project corridor also includes three open drainage channels paralleling the roadway. There will be no significant diversions of drainage areas (Appendix F). As discussed above, any increases in impervious areas due to the construction of wider sidewalks, bus platforms, and curb bulb outs would be negligible. Additionally, as the project progresses, landscaping and BMPs will be strategically placed to offset any potential impacts associated with the additional impervious area that may be added. As such, the roadway improvements associated with the implementation of the project would be negligible in terms of changes to the existing drainage pattern and would not result in substantial erosion or siltation, cause a substantial change in the volume of surface runoff, introduce a new substantial source of polluted runoff, or cause an increase in flooding.

Because the project would result in more than 1 acre of land disturbance, a site specific SWPPP, as referenced previously, will be prepared and implemented during project construction. Implementation of the SWPPP and BMPs would maintain the existing level of runoff from the project site and would reduce sediment and pollutant runoff. During operation, Palm Avenue would operate similar to existing conditions, with storm drainage systems sized to adequately handle stormwater flows consistent with Public Works design standards. The project hardscape and proposed landscaping would reduce potential for erosion during operation.

Additionally, the project would continue operation of Palm Avenue similar to existing conditions and would not introduce structures that could alter, impede, or redirect flood flows. Improvements would enhance drainage capture and conveyance along the corridor, and where feasible, undersized pipes identified during preliminary analysis would be upsized to improve system capacity (Appendix F). Therefore, impacts associated with drainage patterns would be **less than significant**.

d) ***In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?***

Less than Significant Impact. A small portion of the project site (directly north of Georgia Street) is located in floodplain Zone AE, which is considered a Special Flood Hazard Area as identified by FEMA. The flood hazard zones within the project site and project area include the 1% Annual Chance Flood Hazard, the 0.2% Annual Chance Flood Hazard, and are within a Regulatory Floodway (FEMA 2024). Although the northwestern limits of the project are adjacent to a Tsunami Hazard Area, the roadway itself is not considered a Tsunami Hazard Area. Additionally, the project is not in a seiche zone (Appendix F).

During construction, small amounts of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, adhesive materials, grease, and solvents would be used, however; implementation of a SWPPP and construction BMPs would control any accidental pollutant release during construction. In addition, none of these construction materials are considered acutely hazardous. Operation of the

proposed project would not change from its current use, which is a public use ROW, and would not require the routine transport, use, storage or disposal of hazardous substances for continued operation. Given the nature of the proposed project, the implementation of the project would not lead to an increased risk of release of pollutants due to project inundation. Impacts would be **less than significant**.

e) ***Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

Less than Significant Impact. There is not an existing groundwater management plan within or near the project. The San Diego RWQCB Basin Plan (Basin Plan) is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters, including the project site (RWQCB 2021). The City also participates in the development and implementation of the San Diego Bay Water Quality Improvement Plan (WQIP), which implements a water quality monitoring and assessment program that helps track the water quality conditions in the watershed and the effectiveness of jurisdictional strategies to manage stormwater pollution (City of Imperial Beach 2025). The WQIP also implements water quality improvement strategies that address the discharge of trash, such as the City’s green streets program and source control program to maintain MS4 infrastructure (San Diego Bay Watershed Management Area Responsible Parties 2016). As discussed previously in Section 3.10(a), implementation of the Project-specific SWPPP, construction and operational BMPs, and LID requirements would control for pollutant discharge into receiving water bodies using best available control technologies. As such, the project would not conflict with or obstruct implementation of the Basin Plan or the WQIP. The proposed storm drain improvements would involve the rehabilitation, extension, and realignment of storm drain infrastructure to address existing deficiencies and improve system capacity. In areas where grading or ditch constraints exist, perforated pipe systems and retaining walls may be used to support sidewalk widening and ensure effective drainage. The project also evaluated opportunities for multibenefit drainage enhancements, such as water quality treatment and landscape integration, while ensuring compliance with FEMA floodplain requirements near the Otay River. These proposed improvements would also be compliant with existing standards in the Basin Plan and WQIP guiding water quality. As discussed in Section 3.10(a), the proposed project would not substantially interfere with groundwater recharge or supplies and as a result would not impact a groundwater sustainability plan. Therefore, as the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management, impacts would be **less than significant**.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a) *Would the project physically divide an established community?*

No Impact. Based on a review of the City’s zoning map (City of Imperial Beach 2024b), the vast majority of immediately adjacent land use along the length of the project corridor, but not within the project corridor, is designated as general commercial and mixed-use (C/MU-1), with some single-family residential (R- 1- 6000) and urban reserve (UR). The surrounding area also includes some multifamily residential (R- 3000, R-2000, R-1500) and schools (PF). These land designations support land uses and development that provide community cohesion. However, the proposed project would not include the construction of any buildings, roads, or other infrastructure that would physically divide an established community, nor would the project impede access between existing neighborhoods and other areas of the City by creating physical barriers. Rather, the proposed project’s objectives, as detailed in the project description, are to transform Palm Avenue into a safer, more accessible, and visually enhanced multimodal corridor. The proposed improvements include a variety of infrastructure improvements aimed at supporting all modes of travel, pedestrian, bicycle, transit, and vehicular while enhancing the corridor’s overall functionality, thereby enhancing community connectivity. The project would not convert existing land uses or otherwise modify connectivity through or across the Palm Avenue corridor. Permits to Enter associated with temporary implementation activities during the project’s construction phase would require detours; however, access for emergency responders, transit users, businesses, and residents through traffic management plans would be maintained for the duration of construction. Therefore, the proposed project would not physically divide an established community and **no impact** would occur.

b) *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

Less than Significant Impact. The project limits include portions of the City of Imperial Beach and the County of San Diego. As such, the City of Imperial Beach General Plan and Local Coastal Plan were considered in the context of the proposed project. The City of Imperial Beach is not within a specific planning area or community in San Diego County (County of San Diego 2011). Based on a review of the City’s Zoning Code (City of Imperial Beach 2025) and General Plan (City of Imperial Beach 2024b), the project would not affect, alter, or change existing or planned land uses across any portion of the project corridor. No zoning, land use, or General Plan changes are required or proposed, as the project boundaries are within the existing right-of-way, and encroachment permits would be associated with temporary implementation activities, such as minor modifications of driveways and entrances, during the construction of the project. The project consists of mobility and accessibility improvements to an existing major roadway and would not impede with the implementation of the City’s General Plan. The proposed Class IV bicycle lanes, upgraded

transit facilities, landscape enhancements, protected intersections, high-visibility crosswalks, and ADA-compliant curb ramps would enhance pedestrian and bicycle safety and improve the efficiency and accessibility of the roadway, which is consistent with the goals and policies outlined in the City’s Circulation Element (City of Imperial Beach 2024b). Additional minor improvements to drainage would address existing deficiencies and improve system capacity, which is consistent with the City’s Safety Element goal to protect life and property from flooding hazards (City of Imperial Beach 2024b).

The project is also subject to internal review and approvals through the City, including the City's Design Review Guidelines and applicable permitting processes, such as Coastal Development and encroachment permits. As described above, the project would not conflict with policies in the General Plan and Local Coastal Plan. Further, this project is subject to Design Review, which ensures that general standards of orderly development are adhered to and that the policies and objectives of the General Plan and Local Coastal Plan are implemented. Site Plans and permit applications would be reviewed by the City and Planning Commission to ensure project consistency with City regulations. Therefore, this project would adhere to land use plans, policies, and regulations. As such, there would be no conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be **less than significant**.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

No Impact. The proposed project corridor is almost entirely developed and fully built out. As such, the project corridor, under existing conditions, does not support any mineral or oil and natural gas extraction activities. According to the California Department of Conservation Geologic Energy Management Division (DOC CalGEM) well finder map, there are no active oil and gas fields within the vicinity of the project corridor (CalGEM 2025). There are several idle oil and gas wells located at a minimum of one mile from the project corridor. There is also one plugged dry hole well approximately 0.36 miles northeast of the Palm Ave./ Georgia St. intersection (east project corridor boundary).

San Diego County is considered a Production-Consumption Region (DOC 2025b). However, no mining operations are currently ongoing within the project corridor or vicinity (DOC 2025c). Per the State Mining and Geology Board’s classifications, the City is classified as a Mineral Resource Zone (MRZ), specifically an MRZ-3, which is an area known to contain mineral deposits that may qualify as significant mineral resources (DOC 2025). The adjacent San Diego Bay National Wildlife Refuge north of the project corridor is classified as an MRZ-1, where available geologic information indicates that little likelihood exists for the presence of significant mineral resources. An adjacent area to the east of the project corridor, including the Otay Valley Regional Park and a segment of Palm Ave. outside of the project corridor, is classified as an MRZ-2, where geologic information indicates that significant measured or indicated Portland Cement Concrete-grade aggregate resources are present (DOC 2017). However, given that the project corridor is within an entirely built out and urbanized corridor and does not propose improvements that would result in the loss of availability of known mineral resources, **no impact** would occur.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. There are no locally important mineral resource recovery sites delineated on the City’s General Plan or other land use plans (City of Imperial Beach 2024b). As previously discussed in Section 3.2(a), the project corridor is almost entirely developed and fully built out, and as such does not support any mineral or oil and natural gas extraction activities. Idle oil and/or gas wells are located approximately one mile from the project corridor. Additionally, no mining operations are currently ongoing within the project corridor or vicinity. While the project corridor is located on and adjacent to MRZs (DOC 2017), the project does not propose improvements that would result in the loss of availability of known mineral resources or resource recovery sites. Given the project’s relative distance from existing idle or plugged oil and gas wells and location within an entirely built out and urbanized corridor, the project would not result in the loss of availability of a locally important mineral resource recovery site. **No impact** would occur.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

This section is based on technical analysis conducted, including quantitative predictions of noise emissions based on assumptions developed in consultation with the project design engineers. The results of the noise prediction modeling are provided as Appendix G, Noise Supporting Documentation, to this MND.

Existing Setting

The project site is in a fully urbanized area of the City of Imperial Beach (City), characterized by a mix of commercial development, residential neighborhoods, schools, and transit-serving uses. The project spans approximately 1.75 miles along Palm Avenue, between Rainbow Drive on the west and Georgia Street on the east. The corridor traverses residential, commercial, and institutional land uses and is situated in proximity to regional natural resources, including the San Diego Bay National Wildlife Refuge and the Otay River.

Represented by locations ST1 – ST10 in Table 3.13-1, the existing outdoor ambient sound environment of the project location was sampled during a field survey conducted on April 25, 2025 (see Figure 3.13-1, Baseline Sound Pressure Level Measurement Locations). These ambient noise monitor locations are intended to be representative of the existing single-family and multifamily residences and noise-sensitive institutional land uses adjoining the project site. Collected sample sound pressure level measurements at these locations, along with documented investigator observations regarding perceived or witnessed acoustical contributors to this baseline or pre-project noise environment, also appear in Table 3.13-1, with photographs, tagged survey positions, and instrument details provided in Appendix G.

Table 3.13-1. Measured Samples of Existing Outdoor Ambient Sound Level

Survey Position	Location	Time	Leq (dBA)	L10 (dBA)	L50 (dBA)	L90 (dBA)	Notes (Perceived Sound Sources)
ST1	32.586617°, -117.121346	07:21 a.m. to 07:36 a.m.	72	76	71	61	Traffic on Silver Strand Blvd, birds
ST2	32.584775°, -117.119235	07:44 a.m. to 07:59 a.m.	63	66	62	58	Traffic on Silver Strand Blvd, birds, distant landscaping noise
ST3	32.582886°, -117.114424	08:04 a.m. to 08:19 a.m.	76	73	59	57	Traffic on Palm Ave and Ninth St, birds, distant aircraft, distant construction on Ninth St, car subwoofer, military helicopter

Table 3.13-1. Measured Samples of Existing Outdoor Ambient Sound Level

Survey Position	Location	Time	Leq (dBA)	L10 (dBA)	L50 (dBA)	L90 (dBA)	Notes (Perceived Sound Sources)
ST4	32.582790°, -117.110735	08:25 a.m. to 08:40 a.m.	57	60	54	50	Birds, distant aircraft, construction of apartment building at intersection of Palm Ave and 11th St, traffic on 11th St and Donax Ave
ST5	32.582865°, -117.108237	08:44 a.m. to 08:59 a.m.	56	60	56	50	Traffic on Palm Ave and 12th St, distant construction of apartment building on 11th St, military helicopters
ST6	32.582844°, -117.104510	09:02 a.m. to 09:17 a.m.	59	61	58	55	Traffic on Palm Ave and Georgia St, military helicopters, birds, car wash dryer/blower to the north across Palm Ave
ST7	32.584764°, -117.105559	09:22 a.m. to 09:37 a.m.	58	62	56	52	Traffic on Palm Ave and 13th St, Distant aircraft, distant conversations, car wash dryer/blower
ST8	32.584683°, -117.108223	09:41 a.m. to 09:56 a.m.	55	57	54	53	Traffic on Palm Ave and 12th St, birds, dog barks, military helicopters, car wash noise
ST9	32.584498°, -117.112990	10:00 a.m. to 10:15 a.m.	55	58	53	50	Traffic on Palm Ave and Emory St, birds, rustling leaves, airplane noise
ST10	32.585028°, -117.116897	10:19 a.m. to 10:34 a.m.	50	53	48	47	Traffic on Palm Ave and Delaware St, birds, distant conversations, distant aircraft

Source: Appendix G

Notes: Leq = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibels; L10 = sound level exceeded 10% of the time; L50 = sound level exceeded 50% of the time; L90 = sound level exceeded 90% of the time.

The measured outdoor energy-equivalent sound level (Leq) values appearing in Table 3.13-1 range from 50 to 76 A-weighted decibels (dBA) are consistent with expectations for the environment based on the proximity to Palm Avenue/Silver Strand Boulevard, the primary east-west thoroughfare that bisects Imperial Beach. The sound level measurement data also reflects frequent aircraft flyovers, resulting from the project site's proximity to the Naval Outlying Landing Field to the south.

Regulatory Setting and Thresholds of Significance

Federal Transit Administration

In its Transit Noise and Vibration Impact Assessment guidance manual, the Federal Transit Administration (FTA) recommends a daytime construction noise level threshold of 80 dBA Leq over an 8-hour period when detailed construction noise assessments are performed to evaluate potential impacts to community residences surrounding a project (FTA 2018). Although this FTA guidance is not a regulation, it can serve as a quantified standard in the absence of such limits at the state and local jurisdictional levels.

California Department of Transportation

In its Transportation and Construction Vibration Guidance Manual (Caltrans 2020), the California Department of Transportation (Caltrans) recommends 0.5 (inches per second peak particle velocity (ips PPV) as a threshold for the avoidance of structural damage to typical newer residential buildings exposed to continuous or frequent intermittent sources of ground-borne vibration. For transient vibration events, such as blasting, the damage risk threshold would be 1.0 ips PPV (Caltrans 2020) at the same type of newer residential structures. For older structures, these guidance thresholds would be more stringent: 0.3 ips PPV for continuous/intermittent vibration sources, and 0.5 ips PPV for transient vibration events. Additionally, for informational purposes, Caltrans guidance indicates that building occupants exposed to continuous ground-borne vibration in the range of 0.2-0.6 ips PPV would find it “unpleasant or “annoying.” Although these Caltrans guidance thresholds are not regulations, they can serve as quantified standards in the absence of such limits at the local jurisdictional level.

City of Imperial Beach General Plan

The City’s General Plan Noise Element identifies compatible exterior noise levels for various land use types (City of Imperial Beach 2024b). The maximum allowable noise exposure varies depending on the land use. The maximum acceptable Community Noise Equivalent Level (CNEL) for residential uses and other noise-sensitive uses (including schools, libraries, hospitals, hotels, motels) is 60 dBA CNEL. Table 3.13-2 reproduces Figure N-3 from the City’s General Plan Noise Element.

Table 3.13-2. City of Imperial Beach - Land Use Compatibility Guidelines for Development

Land Use	Community Noise Exposure (dBA CNEL)				
	55–60	60–65	65–70	70–75	75–80
Residential, Theaters, Auditoriums, Music Halls, Meeting Halls, Churches					
Transient Lodging – Motels, Hotels					
Schools, Libraries, Museums, Hospitals, Nursing Homes					
Playgrounds, Parks					
Commercial and Office Buildings					
Table Shading Key					
Acceptable	Specified land use is satisfactory. No noise mitigation measures are required.				
Conditionally Acceptable	Uses should be permitted only after careful study and inclusion of protective measures as needed to satisfy the policies of the Noise Element.				
Unacceptable	Development is usually not feasible in accordance with the goals of the Noise Element.				

Source: City of Imperial Beach 2024b.

The City’s General Plan Noise Element also lists the following policies with respect to noise and land use compatibility (City of Imperial Beach 2024b):

- **N-1 Noise Ordinance.** The City shall develop and adopt an ordinance to control noise levels. The ordinance shall set forth specific noise levels (dB meter readings) that are unacceptable and not permitted in the City.

- **N-2 Commercial Vehicles.** The City shall establish regulations limiting the routes, speeds, and operating hours of vehicles generating noise nuisance such as trucks and buses. Trucks over 5000 lbs. load capacity should be limited to highway 75 unless they are making deliveries.
- **N-3 Public Events.** The City should require organizations to submit plans and obtain permits to hold public events in the City. There should be controls placed upon the scheduled start and completion times and the use of noise producing devices such as public address systems and musical amplifiers.
- **N-4 Compliant Center.** A formal complaint center should handle noise complaints. There should be periodic advertising of the noise ordinances and its requirements and encouragement of the public to register complaints.
- **N-5 Land Use Compatibility – Transportation.** The City shall require all new development to meet the exterior noise requirements of the compatibility guidelines shown in Figure N-3.

City of Imperial Beach Municipal Code

Section 9.32.020 of the City's Municipal Code addresses construction noise restrictions (City of Imperial Beach 2022b). As stated, construction activity, including "the use of any tools, power machinery or equipment ore the conduct of construction and building work so as to cause noises disturbing to the peace comfort and quiet enjoyment of property of any person residing or working in the vicinity, between the hours of 7:00 p.m. and 7:00 a.m., Monday through Friday; 5:00 p.m. and 8:00 a.m. on Saturday; or anytime on a federal holiday or Sunday, except when the work is necessary for emergency repairs required for the health and safety of any member of the community, or when prior, written approval has been obtained from the Community Development Director is prohibited." The City does not provide quantitative limits for construction noise during daytime hours; thus, the analysis herein uses the FTA's guidance criterion of 80 dBA L_{eq} over an 8-hour period. With respect to operational noise sources, Section 9.32.020 states that the volume of a sound shall not exceed a weighted sound level of 65 decibels on the "slow" scale at a distance of 50 feet, as measured by a sound level meter, but does not specify explicit hourly noise level limits.

- a) ***Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

Less than Significant Impact With Mitigation Incorporated.

Construction

Construction of the project would result in the temporary generation of noise at the project site. Construction would involve the use of heavy equipment and machinery, such as excavators, loaders, cranes, temporary generators, scrapers, and other equipment. Construction would generate levels of noise that can vary from hour to hour and day to day depending on the equipment in use, the operations being performed, and the distance between the source and receptor. Typically, construction equipment operates in alternating cycles of full power and low power, producing average noise levels less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

Table 3.13-3 provides a list of the sound levels generated by various powered equipment that could be associated with construction of the project, measured at a distance of 50 feet using a "slow" response time constant (1 second). Usually, construction equipment operates in alternating cycles of full power and low

power, producing average noise levels over time that are less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time. Sound source information was obtained from the Noise Source Database developed under National Cooperative Highway Research Program 25-49 (NCHRP 25-49), Development of a Highway Construction Noise Prediction Model (NCHRP 2018).

Table 3.13-3. Sound Levels of Typical Construction Equipment

Equipment	Maximum Sound Level (dBA L_{max}) at 50 feet from Source	Equivalent Sound Level (dBA L_{eq}) at 50 feet from Source
Air Compressor	67	66
Aerial Lift (Man Lift)	73	72
Backhoe	84	76
Compactor (Roller)	83	N/A
Concrete Saw	88	85
Crane, Mobile	76	74
Dozer	86	80
Generator	68	67
Grader	79	N/A
Paving - Asphalt	83	N/A
Paving - Concrete	88	85
Scraper	92	N/A
Welding Machine	72	71

Notes: dBA = A-weighted decibel; L_{max} = maximum instantaneous noise level. N/A = Equipment without average (L_{eq}) noise levels are non-stationary and best represented only by maximum instantaneous noise level (L_{max}).

Source: NCHRP 2018

Aggregate noise emission from proposed project construction activities, broken down by sequential phase, was predicted at two evaluation distances to the nearest existing noise-sensitive receptors: 1) from the nearest position of the construction site boundary and 2) from the geographic center of the construction site, which serves as the time-averaged location or geographic *acoustical centroid* of active construction equipment for the phase under study. The intent of the former distance is to help evaluate anticipated construction noise from equipment or vehicle activity expected to be at the boundary for some period of time, which would be most appropriate for phases such as Demolition or New Feature Construction. The latter distance is used in a manner similar to the general assessment technique as described in the FTA guidance for construction noise assessment when the location of individual equipment for a given construction phase is uncertain over some extent of (or the entirety of) the construction site area.

Thus, in this studied scenario associated with construction activities along Palm Avenue and because of the equipment location uncertainty, each piece of equipment for a construction phase is assumed to operate at the nearest position of the construction site boundary to the nearest noise-sensitive receptor for up to 4 hours, while the rest of the equipment is assumed to operate from the acoustical centroid position (a horizontal distance of approximately 150 feet) for the remaining 4 hours of the 8-hour period. Construction will progress linearly along Palm Avenue, and while construction would occur as close as 25 feet away from noise-sensitive receptors in some cases, activities at such close distances would only take place for a short period of time, and equipment would move further as construction progresses.

The nearest identified noise-sensitive receptors to the project include mobile homes and multifamily residences along 7th Street, single-family residences along Rainbow Drive, and condominiums along Palm Avenue and within Bayside Landing. Construction activities would take place as close as 25 feet from these sensitive receptors. Noise-sensitive receptors beyond those studied herein would benefit from structural occlusion provided by the studied residential receptors and existing commercial uses; thus, the studied scenarios presented below are worst-case.

As shown in Table 3.13-4 and detailed in the worksheets appearing in Appendix G, combined construction noise emission for each listed phase was predicted with a model that emulates an updated version of the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) and utilizes its reference sound level data by equipment type (e.g., selected data from Table 3.13-3). The predicted noise level exposures from the proposed construction activities are summarized in Table 3.13-4.

Table 3.13-4. On-Site Construction Noise Model Results Summary

Construction Phase (Equipment)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptors (dBA)	Exceed 80 dBA 8-hour L_{eq} Threshold? (Yes/No) ^a
Demolition (dozer, excavator, concrete saw)	91	Yes
Site Preparation (dozer, backhoe)	90	Yes
Grading (grader, excavator, backhoe, scraper, dozer)	96	Yes
New Feature Construction (man lift, generator, crane, welding machine, backhoe)	86	Yes
Roadway Paving (pavers, paving equipment, roller)	90	Yes
Architectural Coating (air compressor)	70	Yes

Notes: See Appendix G for complete results. dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level.

* Per FTA guidance (2018)

As presented in Table 3.13-4, construction noise levels during all phases are expected to exceed the FTA-based guidance criterion of 80 dBA 8-hour L_{eq} . Additionally, if construction activities take place as close as 25 feet to a noise-sensitive receptor along Palm Avenue, construction noise levels would be higher than existing outdoor ambient noise levels by up to 33 dBA, based on measured samples of existing ambient sound levels at ST2; these increases would be temporary, as construction is anticipated to last no more than 20 months and will progress along Palm Avenue as construction phases are completed sequentially.

Thus, MM-NOI-1 is recommended and studied in the predictive analysis, which assumes the implementation of an 8-foot-tall temporary noise barrier during the Demolition, Site Preparation, New Feature Construction, and Roadway Paving phases, as well as a 14-foot-temporary noise barrier during the Grading phase. Temporary noise barriers should be strategically placed along the project boundary so as to block the direct line-of-sight between a noise-sensitive receptor and construction activities. For example, for a receptor located along Palm Avenue near measurement location ST2 (see Figure 3.13-1), a temporary barrier should be placed along the southern project boundary where feasible. Table 3.13-5 presents the predicted construction noise levels during the mitigated phases with the incorporation of MM-NOI-1.

Table 3.13-5. On-Site Construction Noise Model Results Summary - Mitigated

Construction Phase (Equipment)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor (dBA)	Exceed 80 dBA 8-hour L_{eq} Threshold? (Yes/No) ^a
Demolition (dozer, excavator, concrete saw)	79	No
Site Preparation (dozer, backhoe)	78	No
Grading (grader, excavator, backhoe, scraper, dozer)	80	No
New Feature Construction (man lift, generator, crane, welding machine, backhoe)	75	No
Roadway Paving (pavers, paving equipment, roller)	79	No

Notes: See Appendix G for complete results. dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level.

^a Per FTA guidance (2018)

With the implementation of MM-NOI-1, estimated construction noise levels are predicted to reach up to 80 dBA L_{eq} over an 8-hour period at the nearest existing residences, located along Palm Avenue at the project's southern boundary line during the Grading phase. Such levels would be up to 17 dBA higher than existing outdoor ambient noise levels measured at ST2 (Table 3.13-1).

MM-NOI-1 would require the City, or its designee, to implement certain noise reduction measures as site conditions warrant. Proper implementation of MM-NOI-1 would reduce the highest predicted estimated non-mitigated construction noise level from 96 to 80 dBA 8-hour L_{eq} , which would be within the applicable FTA guidance criterion. Therefore, impacts would be **less than significant with mitigation**.

Operation

Upon completion of construction, the project would include a variety of infrastructure improvements aimed at supporting all modes of travel, pedestrian, bicycle, transit, and vehicular. Key improvements would include lane reductions to calm traffic, widened sidewalks to improve pedestrian mobility and ADA accessibility, new installations of Class IV protected bike lanes along portions of the corridor, curb extensions, improved parking management, and signal enhancements. Ultimately, according to a Transportation Memorandum completed by CR Associates (Appendix G), the project would not add general-purpose vehicle capacity to the Palm Avenue multimodal corridor.

Existing average daily traffic (ADT) volumes on Palm Avenue range from 10,500 to 47,100 along certain segments. Based upon the fundamentals of acoustics, a 100% increase in ADT, or a doubling of the existing volumes, would be needed to result in a 3-dB increase in noise levels, which would be just audible to the average human listener. Given there would not be an increase in vehicle capacity to Palm Avenue, such an increase is not expected.

Additionally, general infrastructure improvements along the corridor would not introduce new major noise-generating operational noise sources. Measured existing outdoor ambient sound levels ranged from 50 dBA to 76 dBA at various distances from the corridor, and such levels are not likely to increase due to proposed project improvements.

On this basis and compared to the measurement samples of L_{eq} presented in Table 3.13-1, project operation noise is anticipated to be comparable to or less than the existing outdoor ambient level at the nearest existing noise-sensitive receptors and thereby comply with the applicable City code and General Plan. For these multiple reasons, project operation noise would result in a **less than significant impact**.

MM-NOI-1 **Temporary Construction Noise Reduction.** The City, or its designee, shall implement the following measures as necessary to achieve on-site noise control and sound abatement that, in the aggregate, would result in a minimum construction noise reduction of approximately 15 decibels (dB) at residences along Palm Avenue that may be exposed to construction activity noise as close as 25 feet away:

- **Install noise abatement** on the site boundary (or within, as practical and appropriate) in the form of sound blankets or comparable temporary solid barriers that 1) are at least 8 feet tall during the Demolition, Site Preparation, New Feature Construction, and Roadway Paving phases, and 2) are at least 14 feet tall during the Grading phase to occlude construction noise emission between the site (or specific equipment operation as the situation may define) and the noise-sensitive receptor(s) of concern (discussed below).
 - By way of example, suspended sound blankets, field-erected plywood sheeting, or comparable temporary solid (or flexible but sufficiently massive) barriers (of minimum sound transmission class [STC] rating of 25, which per California Department of Transportation guidance indicates would permit up to 15 dB of expected barrier insertion loss) would occlude construction noise emission between the site (or specific equipment operation as the situation may define) and the noise-sensitive receptor(s) of concern.
 - Noise-sensitive receptors of concern include but are not limited:
 - 1) single-family residences bounded by California 75 (CA-75) and 5th Street near the western terminus of the project site. To effectively mitigate construction noise, a barrier would be placed along the southern project boundary when activities take place near these sensitive receptors.
 - 2) single-family residences along Rainbow Drive, south of Palm Avenue. To effectively mitigate construction noise, a barrier should be placed along the western project boundary along Rainbow Drive when activities take place near these sensitive receptors.
 - 3) mobile homes bound by Palm Avenue to the south and CA-75 to the north. To effectively mitigate construction noise, a barrier would be placed along the southern project boundary when activities take place near these sensitive receptors.
- **Administrative controls** (e.g., reduce operating time of equipment and/or prohibit usage of equipment type[s] within certain distances to a nearest receiving occupied off-site property).
- **Engineering controls** (change equipment operating parameters [e.g., speed, capacity], or install features or elements that otherwise reduce equipment noise emission [e.g., upgrade engine exhaust mufflers]).

Appendix G to this MND includes a construction noise prediction worksheet that illustrates a sample scenario of what the anticipated and quantifiable noise reduction effect would be of adding temporary noise barriers to reduce construction noise exposure at noise-sensitive receptors along Palm Avenue.

b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Less than Significant Impact. Vibration is oscillatory movement of mass (typically a solid) over time. Depending on their distances to a sensitive receptor, operation of large bulldozers, graders, loaded dump trucks, or other heavy construction equipment and vehicles on a construction site have the potential to cause high vibration amplitudes.

For purposes of this impact assessment, 0.3 ips PPV is used as the standard for evaluating the potential risk of residential building damage due to “continuous” or frequently occurring ground-borne vibration events (Caltrans 2020).

Ground-borne vibration attenuates rapidly, even over short distances. The attenuation of ground-borne vibration as it propagates from source to receptor through intervening soils and rock can be estimated with expressions found in Federal Transit Administration (FTA) and the California Department of Transportation guidance. By way of example, in a worst-case scenario, a roller may operate as close as 25 feet to the nearest receiving sensitive land use during the Roadway Paving construction phase. The estimated vibration velocity level in this scenario would be 0.21 ips per the equation as follows (FTA 2018):

$$PPV_{rcvr} = PPV_{ref} \times (25/D)^{1.1} = 0.21 \text{ ips PPV} = 0.21 \times (25/25)^{1.1}$$

In the above equation, PPV_{rcvr} is the predicted vibration velocity at the receiver position (i.e., residence), PPV_{ref} is the reference value at 25 feet from the vibration source (the bulldozer), and D is the actual horizontal distance to the receiver from the source.

Based upon the identified distance between construction activities and the closest existing residential structures, predicted ground-borne vibration velocity PPV values associated with project construction are below the 0.3 ips PPV threshold for building damage risk; these levels represent a worst-case scenario and would be temporary. For informational purposes, ground-borne vibration levels would be greater than the recommended 0.2 ips PPV limit for building occupant annoyance. However, as described previously Thus, impacts during construction would be less than significant.

Once operational, the proposed project would not be expected to feature major producers of ground-borne vibration. For this reason, project operational ground-borne vibration at off-site receptors would be **less than significant**.

c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

Less than Significant Impact. The Naval Outlying Landing Field (NOLF) Imperial Beach is approximately 1.2 miles south of the project site. According to the NOLF Imperial Beach Land Use Compatibility Plan, the project site is outside the 60 dBA CNEL noise contour, so people residing or working in the project area would not be exposed to significant aviation noise levels (SDCRAA 2015). Therefore, aviation noise exposure would be considered a less than significant impact.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

- a) ***Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

Less than Significant Impact. The proposed project would involve infrastructure upgrades to the existing Palm Avenue transportation corridor between Rainbow Drive and Georgia Street within the City of Imperial Beach. Project components include roadway resurfacing, sidewalk widening, accessibility improvements, transit stop enhancements, and localized stormwater and utility upgrades. The project would not involve the construction of new residential units, commercial uses, or employment centers that could directly induce population growth. Nor would the project require amendments to the City's General Plan, zoning ordinance, or other regulatory frameworks that could increase allowable development intensity.

Although the project would improve mobility along Palm Avenue and enhance access to existing amenities and public transit, these improvements are intended to serve existing and anticipated users of the corridor, consistent with adopted land use and mobility plans. The upgrades are not designed to accommodate or incentivize unplanned growth, but rather to address current deficiencies in multimodal circulation and streetscape conditions.

Regional growth projections prepared by the San Diego Association of Governments (SANDAG) further substantiate this conclusion. According to SANDAG's 2025 Regional Plan, Appendix F: Regional Growth Forecast with Sustainable Communities Land Use Pattern, Series 15 (Table F.1), the City of Imperial Beach has a 2022 population of 26,243 and is projected to have a population of approximately 25,351 by 2050 (SANDAG 2025). These projections demonstrate a downward trend, indicating that Imperial Beach is not expected to accommodate a substantial share of the region's future growth. Given this declining trajectory, even if modest population growth were to occur within the City due to implementation of the proposed project, such growth would be incremental and well within the levels anticipated by the General Plan and SANDAG's regional forecasts, and therefore would not be considered substantial in a CEQA context.

While the project would also include limited stormwater and utility upgrades, these improvements would be designed to correct localized deficiencies and would not substantially expand service capacity in a manner that could indirectly support population growth. All proposed improvements would occur within the existing public right-of-way and would be consistent with the land use designations, growth assumptions, and development intensity reflected in the City of Imperial Beach General Plan and SANDAG's Regional Transportation Plan (RTP).

Accordingly, the project would not induce substantial unplanned population growth, either directly or indirectly. Impacts under this threshold would be **less than significant**.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Less than Significant Impact. The proposed project improvements are located entirely within the existing public right-of-way of Palm Avenue, an urbanized arterial corridor in the City of Imperial Beach. The proposed project corridor is primarily characterized by commercial development, public facilities, and surface parking areas, with some interspersed multifamily and single-family residential uses located adjacent to, but not within, the project footprint.

The project would not require the acquisition or demolition of any residential structures, nor would it involve the displacement of existing residents. Design considerations such as sidewalk widening, bus stop relocation, and driveway modifications would be carefully planned to minimize impacts to adjacent properties and maintain access for all land uses, including residential ones. Where feasible, construction related activities would be confined to the existing public right-of-way to avoid encroachment onto private parcels.

As such, the project would not result in the displacement of substantial numbers of people or housing and would not necessitate the construction of replacement housing elsewhere. Therefore, the impact would be **less than significant**.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES – Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

- a) ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:***

Fire protection?

Less than Significant Impact. Fire protection within the project area is provided by the Imperial Beach Fire-Rescue Department. The closest fire station to the project site is the Imperial Beach Fire-Rescue Department station, which is approximately 0.53 miles south of the project site on Imperial Beach Boulevard. In addition, the San Diego Fire-Rescue Department Station 30 is approximately 1.24 miles southeast of the project site.

The project is a public infrastructure project and would not generate a new population base that would generate the need for new or additional fire services, or otherwise cause a substantial change in the existing response times. This determination is based on the project's location along an existing, fully urbanized corridor that does not include any new land use entitlements, housing, or other development that would increase population or service demand. Further, the traffic study prepared by CR Associates (Appendix H) for the project concluded that all improvements proposed within the existing Palm Avenue right-of-way 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. Consistent with the General Plan Circulation Element's goal of improving multimodal mobility while maintaining emergency access, the reconfigured lane geometry and new signal timing are expected to facilitate more reliable travel for roadway users, including emergency service providers. Thus, no new fire service facilities would be required as a result of the project, and there would be no need to alter existing facilities. Moreover, the project is expected to improve travel flow for roadway users and is anticipated to have a positive effect on emergency service response time.

Construction is planned for approximately 20 months, and may require the temporary closure of travel lanes, potentially affecting traffic flow and emergency services response time. Temporary lane closures would occur at varying intervals along Palm Avenue. However, traffic control, including a detailed traffic management plan supported by comprehensive notifications, would be implemented to ensure adequate access and passage of emergency vehicles along Palm Avenue and adjacent properties would be maintained at all times during construction. Therefore, response and access for emergency services providers would not be substantially altered during the temporary construction period. Overall, the project would not generate the need for new or altered fire protections services or facilities and impacts would be **less than significant**.

Police protection?

Less than Significant Impact. Police protection within the project area is provided by and under contract with the San Diego County Sheriff's Department. The closest police station to the project site is the San Diego County Sheriff's Department station, which is approximately 0.53 miles south of the project site on Imperial Beach Boulevard; directly adjacent to the Imperial Beach Fire-Rescue Department station. In addition, the San Diego Police Department has a sub-station located approximately 1.75 miles southeast of the project site.

As discussed above in the subsection Fire Protection, the project involves public infrastructure improvements and would not generate a new population base that would generate the need for new or additional police services and no substantial change in the existing response times are anticipated. No new police service facilities would be required as a result of the proposed project, and there would be no need to alter existing facilities. Moreover, the project is expected to improve travel flow for roadway users and is anticipated to have a positive effect on emergency service response time.

As also described above, construction is planned for approximately 20 months, and may require the temporary closure of travel lanes, potentially affecting traffic flow and emergency services response times. The need for temporary lane closures is anticipated to occur at varying intervals along the project corridor; however, traffic control and management would be implemented to ensure adequate access and passage of emergency vehicles along Palm Avenue and adjacent properties is maintained at all times during construction. Proper signage, noticing, detouring, and coordination with the Sheriff's office will be provided. Therefore, response and access for police service providers would not be substantially altered during the temporary construction period or during future, post-project implementation. Overall, the project would not generate the need for new or altered police protections services or facilities and impacts would be **less than significant**.

Schools?

Less than Significant Impact. There are 11 schools within a 2-mile radius of the project site. The closest schools are the Imperial Beach Preschool Center (approximately 0.11 miles north of the project site) and the Bayside Elementary School (approximately 0.33 miles north of the project site). None of the proposed road work is to be completed alongside these schools.

Similar to the analysis presented above for Fire and Police services, the proposed project involves infrastructure improvements, and those proposed improvements would not generate a new population base that would result in the need for new or additional schools or otherwise cause a substantial change in the existing educational facility conditions. Temporary changes to access, including delays and detours, for nearby schools, may be anticipated during construction due to lane closures and detours. However, permanent access impacts to the schools are not anticipated. Thus, no new school services would be required as a result of the project, and there would be no need to alter existing facilities. As such, impacts are anticipated to be **less than significant**.

Parks?

No Impact. There are four public parks located near the project site including Teeple Park, Sellers-Keever Park, Imperial Beach Dog Park, and Veterans Park. The closest park to the project site is Teeple Park, which is approximately 0.08 miles north of the project. The proposed project improvements would be implemented within the existing public-owned Palm Avenue ROW and would therefore not physically impact park access or park features. Given the proposed project's public infrastructure improvement parameters, those improvements within an existing urbanized corridor would not generate a new population base that would generate the need for new or additional park facilities or otherwise cause a substantial change in the existing conditions. Therefore, no additional park services would be required as a result of the proposed project, and there would be no need to alter existing facilities. **No impact** would occur.

Other public facilities?

No Impact. Other public facilities in close proximity to the proposed project include public libraries. The closest libraries to the project site are the San Diego County Library and the W. Burke Mills Library. The closest library to the project site is the W. Burke Mills Library, which is approximately 0.29 miles south of the project. These facilities would not be directly impacted by the proposed construction. As discussed throughout this section, the project is a public infrastructure project and would not generate a new population base that would generate the need for new or additional public facilities or otherwise cause a substantial change in the existing conditions. Therefore, no new public facilities would be required as a result of the project, and there would be no need to alter existing facilities. As such, the implementation of the proposed project, along with its construction activities, would not adversely impact other public facilities within the vicinity of Palm Avenue. **No impact** would occur.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less than Significant Impact. The project would involve multiple improvements along Palm Avenue between Rainbow Drive and Georgia Street in the City of Imperial Beach, with key objectives to enhance multimodal access, safety, and corridor aesthetics through the installation of protected Class IV bike lanes, widened sidewalks, upgraded transit stops, and new landscaping features. The project would not include residential development, employment centers, or other growth-inducing elements that would result in substantial increases in population or long-term user demand on existing recreational facilities.

Although the project would improve access to existing recreational amenities, including the Bayshore Bikeway, the Border to Bayshore Project, and the San Diego Bay National Wildlife Refuge, these improvements would be intended to enhance safety and connectivity for current users rather than attract a substantially higher volume of new users. Incremental increases in visitation to recreational resources

may occur; however, these would be dispersed over a broader network of facilities and time and would not be expected to result in concentrated use or physical deterioration of any specific site.

Moreover, the project would not propose any modifications to neighborhood or regional parks nor provide new physical connections that would redirect or intensify usage at any one facility. Improvements such as pedestrian-scale lighting, ADA-accessible infrastructure, and enhanced transit stop designs would instead support existing usage patterns in a safer and more sustainable manner.

Given that the project would not result in population growth, would not physically alter recreational facilities, and would merely enhance existing access rather than induce new demand, the potential for the project to cause or accelerate substantial physical deterioration of neighborhood or regional parks would be **less than significant**.

b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?*

Less than Significant Impact. The project would not include the construction or expansion of any recreational facilities that might cause adverse physical environmental effects. Rather, the project would consist of multimodal transportation improvements within the existing public right-of-way of Palm Avenue. Project components, including Class IV protected bike lanes, widened sidewalks, enhanced crosswalks, and new landscaping, would be implemented to improve multimodal access and safety and would not constitute standalone recreational facilities.

Although certain project features may support recreational activities such as walking or cycling, these improvements would be integrated into the City's transportation infrastructure and would serve utilitarian and connectivity functions rather than recreational programming. No new recreational structures, amenities, or open space improvements would be introduced by the project, and no off-site parkland or trail expansions would be required for its implementation.

Furthermore, the project would not involve any off-site improvements or secondary effects that would necessitate new or expanded recreational facilities elsewhere. The limited physical footprint of the project, confined to the disturbed and urbanized Palm Avenue corridor, would avoid environmentally sensitive lands and would not result in indirect effects that could necessitate recreational facility development as mitigation or as a secondary feature.

As such, the project would not result in the construction or expansion of recreational facilities that could have an adverse impact on the physical environment. Therefore, the impact would be **less than significant**.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

This section is based on the Palm Avenue Complete Multi-Modal Corridor Project – Transportation CEQA Memorandum, prepared for the Project by CR Associates on October 31, 2025. The memorandum is included as Appendix H to this document.

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

Less than Significant Impact. Based on review of the proposed project, 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 the City of Imperial Beach Bicycle Master Plan, Local Road Safety Plan (LRSP), and the SANDAG Regional Plan. The City's Bicycle Master Plan includes the following policy which applies to the project:

Policy C-19 Bikeway Facilities Encouraged: Bikeways shall be encouraged within the City and adjoining jurisdictions as a compliment to Imperial Beach's small town residential character and recreation emphasis, as an effective alternative to automobile travel, to maximize the impact of air quality and energy conservation and for the convenience of residents and visitors.

The City's Bicycle Transportation Plan (June 2008) includes description of bikeway facilities: Class I bike paths, Class II bike lanes and Class III bike routes.

- Class 1 Bike Paths are hard surface routes within an exclusive right-of-way physically separated from vehicular roadways and intended specifically for non-motorized use. They are generally two-way with center striping, with a minimum paved width of eight feet, with an additional two feet of graded edge on each side, for a total of twelve feet.

- Class 2 Bike Lanes facilities are marked bicycle lanes within roadways adjacent to the curb lane, delineated by appropriate striping and signage. Bicycle lanes must be one-way facilities and carry traffic in the same direction as adjacent motor vehicle traffic.
- A Class 3 Bike Route facility is a suggested bicycle route marked by a series of signs designating a preferred route between destinations such as residential and shopping areas.

Per Caltrans Design Information Bulletin Number 89-02 on Class IV Bikeway Guidance (Separated Bikeways/Cycle Tracks):

- A Class 4 Bikeway (separated bikeway) is a bikeway for the exclusive use of bicycles and includes a separation required between the separated bikeway and the through vehicular traffic.

The Bicycle Transportation Plan recommends a Class 1 Bike Path along SR-75, west of Rainbow Drive and a Class 2 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 project also proposes Class 4 Protected Bike Lanes along SR-75/Palm Avenue from Rainbow Drive to eastern City limit. The project proposes to upgrade the bicycle facilities along Palm Avenue in the City's Bicycle Transportation Plan to protected bike lanes.

The City's Local Road Safety Plan (2022c) 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 project proposes similar improvements to the LRSP, as noted in the project description. As such, the project would be consistent with the City's LRSP.

The SANDAG 2025 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 project will provide Class 4 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.

Therefore, the project would not conflict with any program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities and impact would be **less than significant**.

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

Less than Significant Impact. CEQA Guidelines Section 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 project is an active transportation project which would add Class 4 bikeway along SR-75 and Palm Avenue, signal upgrades along with other multimodal improvements along the corridor. The Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018) states that "active transportation projects generally reduce VMT and therefore are presumed to cause a less-than significant impact on transportation." The City of Imperial Beach Transportation Impact Guidelines Vehicle Miles Traveled and Level of Service Assessment (October 2020) also consider bike projects to be screened out of requiring a detailed analysis for VMT. Per city's guidelines, screened out is defined as projects not needed to be analyzed for CEQA purposes that already support VMT reduction.

Therefore, the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and impact would be **less than significant**.

- 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)?***

Less than Significant Impact. The project would not substantially increase hazards due to geometric design features or incompatible uses. The roadway improvements and traffic signal modifications would be designed to applicable design and engineering standards used by the City. 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 per applicable City standards and the CA Manual of Uniform Traffic Control Devices (MUTCD). Any construction-period traffic would be temporary and managed through standard measures (i.e., a traffic management plan). As part of traffic management during construction of the project, traffic control plans would be implemented to manage traffic and provide access to all road users along the corridor and at the cross-streets and intersections.

Therefore, impacts due to increase hazards due to a geometric design feature or incompatible uses would be **less than significant**.

- d) ***Would the project result in inadequate emergency access?***

Less than Significant Impact. The project would not result in inadequate emergency access. All improvements occur within the existing Palm Avenue right-of-way and are intended to reduce excessive 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 project would not result in inadequate emergency access during construction and operation and impact would be **less than significant**.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☐	☒
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

The evaluation of potential impacts on tribal cultural resources (TCRs) is based on the findings resulting from tribal consultation conducted by the City, as the lead agency, as well as the findings of Section 3.5, Cultural Resources, in this MND. Background research conducted to inform this analysis includes a California Historical Resources Information System database records search conducted at the South Coastal Information Center, a search of the NAHC SLF, a review of historical topographic maps and aerial photographs, a cultural resources intensive pedestrian survey of the project site, and the results of formal tribal consultation completed by the City pursuant to California AB 52.

Native American Heritage Commission Sacred Lands File Search

Dudek requested an NAHC search of the SLF for the project site and a 1.0-mile search radius on March 28, 2025. The SLF consists of a database of known Native American resources. These resources may not be included in the South Coastal Information Center database. NAHC replied via email on April 21, 2025, stating that the SLF search was completed with negative results. Negative results indicate there is no presence of Native American cultural resources within 1.0-mile search radius of the project site and not necessarily directly within the project site. Additionally, NAHC provided a list of 19 California Native American tribal representatives that should be contacted for more information on potential tribal sensitivities regarding the proposed project.

Assembly Bill 52 Consultation Outreach

AB 52 of 2014 amended California Public Resources Code Section 5097.94 and added California Public Resources Code Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that TCRs must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. California Public Resources Code Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American tribe. A TCR fulfills one of the following requirements:

- Is on the California Register of Historical Resources or a local historic register
- Is eligible for the California Register of Historical Resources or a local historic register
- Is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of California Public Resources Code Section 5024.1

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project site, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, MND, or EIR by contacting those tribal groups who have previously provided formal written request for notification of projects under the agency’s jurisdiction.

Section 1(b)(9) of AB 52 establishes that “a substantial adverse change to a tribal cultural resource has a significant effect on the environment.” Effects on TCRs should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the California Public Resources Code, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource.” Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to TCRs, the consultation shall include those topics (California Public Resources Code Section 21080.3.2[a]). Finally, the environmental document on which the tribal consultation is focused, as well as the mitigation monitoring and reporting program (where applicable), developed in consideration of information provided by tribes during the formal consultation process, shall include any mitigation measures that are adopted (California Public Resources Code Section 21082.3[a]).

The project is subject to compliance with AB 52 (California Public Resources Code Section 21074), which requires consideration of impacts on TCRs as part of the CEQA process and that the lead agency notify California Native American tribal representatives (that have requested notification) who are traditionally or culturally affiliated with the geographic area of the proposed project. Nineteen California Native American tribal representatives identified on the City’s AB 52 contact list were sent letters from the City on March 17, 2026. The notification letters contained a project description, a project location map, an outline of AB 52 timing, an invitation to consult, and contact information for the appropriate lead agency representative. AB 52 allows tribes 30 days after receiving notification to request consultation. If a response is not received within the allotted 30 days, it can be assumed that consultation is declined. As of date, one Native American Tribal Representative, the San Pasqual Band of Mission Indians has consulted with the City. Consultation with San Pasqual Band of Mission Indians is ongoing. Table 3.18-1 summarizes the AB 52 consultation efforts for the project thus far.

Table 3.18-1. Assembly Bill 52 Native American Tribal Outreach

Native American Tribal Representative	Consultation Record
San Pasqual Band of Diegueno Mission Indians	Request to consult received on 3/19/2026; Meeting with Jason Lavigne 4/22/2026 and San Pasqual requested a copy of the Dudek field survey from 5/15/2025, the copy of the Cultural Resources Monitoring Plan, and all aerials/maps of the project area.
Barona Group of the Capitan Grande	Emailed the letter to this group. No response to consult. The 30 days to consult expired on 3/6/2026.
Campo Band of Diegueno Mission Indians	No response to consult. The 30 days to consult expired on 4/19/2026.
Ewiiapaayp Band of Kumeyaay Indians	No response to consult. The 30 days to consult expired on 4/19/2026.
lipay Nation of Santa Ysabel	No response to consult. The 30 days to consult will expire on 5/11/2026.
Inaja-Cosmit Band of Indians	No response to consult. The 30 days to consult expired on 4/19/2026.
Jamul Indian Village	No response to consult. The 30 days to consult expired on 4/18/2026.
La Posta Band of Diegueno Mission Indians	No response to consult. The 30 days to consult expired on 4/19/2026.
Manzanita Band of Kumeyaay Nation	No response to consult. The 30 days to consult will expire on 5/4/2026.
Mesa Grande Band of Diegueno Mission Indians	No response to consult. The 30 days to consult expired on 4/23/2026.
Sycuan Band of the Kumeyaay Nation	No response to consult. The 30 days to consult expired on 4/19/2026.
Viejas Band of Kumeyaay Indians	No response to consult. The 30 days to consult expired on 4/19/2026.

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a) *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?***

No Impact. As discussed in Section 3.5, Cultural Resources, no previously recorded archaeological resources of Native American origin or TCRs listed in the California Register of Historical Resources or a local register were identified within the Project sites as a result of the South Coastal Information Center records, and the NAHC SLF results were negative. Additionally, the City notified California Native American Tribal representatives who are traditionally or culturally affiliated with the geographic area of the Project pursuant to AB 52. While Consultation with San Pasqual Band of Mission Indians is ongoing, no TCRs were identified as a result of information provided from consulting tribes. Therefore, the Project would not adversely affect TCRs that are listed or eligible for listing in the state or local register, and **no impact** would occur.

- b) ***A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

Less-Than-Significant Impact with Mitigation Incorporated. The project is subject to compliance with AB 52 (PRC 21074), which requires consideration of impacts to TCRs as part of the CEQA process and requires lead agencies to provide notification of proposed projects to California Native American Tribal representatives that have requested such notifications. While the City has not identified any TCRs within the project site that would warrant discretionary designation of a resource as a TCR through tribal consultation under AB 52, the City understands that there is a potential to encounter intact cultural deposits to exist within native soils.

Moreover, given that the project site is within proximity of eight previously recorded cultural resources and one newly identified cultural resource within the 1.0-mile radius of the project, there is potential for cultural resources to be buried in alluvial and flood deposits. If project construction activities were to affect previously unknown TCRs in a manner that would damage their cultural value, a significant impact could result. To ensure project development would not result in potential impacts to cultural resources or TCRs, the project would implement the City's standard mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3 outlined in the Cultural Resources section above. Implementation of MM-CUL-1 through MM-CUL-3 would ensure that potential impacts to TCRs would remain **less than significant with mitigation incorporated**.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, waste water treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the waste water treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

- a) ***Would the project require or result in the relocation or construction of new or expanded water, waste water treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

Less than Significant Impact. As summarized in Section 2.2, the project corridor is located within a fully built out and urbanized area of the City, and currently serves as a vital transportation arterial for the community. The project is a public infrastructure project that proposes the following improvements: lane reductions, widening sidewalks, installing Class IV protected bike lanes, upgraded or relocated bus stops, reconfiguration of on-street parking, minor modifications to driveways and alley entrances, realignment of certain intersections to improve safety and operational efficiency (see Figure 3.10-1), the installation of protected intersections, high-visibility crosswalks, and ADA-compliant curb ramps, drainage improvements/enhancements, and various aesthetic and landscape enhancements. These improvements would enhance existing transportation infrastructure without introducing new residential or commercial development. As discussed in Section 3.14, Population and Housing, the project would not be designed to accommodate or incentivize unplanned population growth and would not substantially expand service capacity in a manner that could indirectly support population growth, and thus would not generate a new population base that would increase demand for new or expanded utilities. All utilities, including water, wastewater, stormwater drainage, electric, gas, and telecommunication facilities exist within the urbanized project site. The potential for relocation of any utilities due to the proposed project improvements, including stormwater/drainage improvements (see Section 3.10, Hydrology and Water Quality) would be identified as part of the final design process; however, to the maximum extent practicable any relocated utilities or improvements proposed would take place within the existing public roadway right-of-way and within their existing horizontal and vertical alignments thereby minimizing environmental effects. No new utilities or utility alignments outside of the Palm Avenue Corridor limits are anticipated. Proactive coordination with all utilities companies will be conducted to ensure any needed relocations are completed with no interruption of services.

Any modifications or improvements to the existing irrigation systems, specifically in the context of water usage will require continued service and provision through the City's water provider California American Water. This is a private utility company that manages water supply, distribution, and customer service for the City of Imperial Beach. However, the water is primarily imported through regional systems managed by the San Diego County Water Authority, which purchases water from the Metropolitan Water District of

Southern California (AMWater 2025). As referenced above, any new or replaced irrigation lines would be relocated within the existing Palm Avenue ROW and as close to their existing alignments as possible to minimize areas of disturbance. The irrigation system would continue to rely upon the water services and usage provided by California American Water and through the existing management and purchasing processes. As summarized above, no new impacts outside of the already urbanized Palm Avenue corridor right-of-way are expected to be required. Therefore, impacts would be **less than significant**.

- b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?***

Less than Significant Impact. Water usage within the proposed project corridor is limited to regular irrigation needs associated with existing landscaping within the project corridor. Additional water needs during construction would be temporary and minimal for watering the site, fugitive dust control, and other construction related needs. Once operational and consistent with existing conditions, the project would only require use of water for preserved and proposed landscape irrigation systems. As discussed under Section 3.19(a), water supply for landscaping within the corridor would continue to be provided via California American Water, existing management and purchasing processes also continuing. California American Water's 2020 Urban Water Management Plan (UWMP) for San Diego County provides water supply reliability assessments for normal, dry, and multiple dry years and confirms water supply reliability for the project and County in a five-year planning cycle, as required by the California Urban Water Management Planning Act (AMWater 2021). Because the 2025 UWMP is not due until 2026, the 2020 UWMP remains the operative planning document and provides the basis for evaluating water supply reliability for the proposed project. The project would maintain the existing landscaping where appropriate and consistent with the City's corridor enhancement objectives. The proposed project would also remove invasive plant species, and install drought-tolerant and shade-providing vegetation throughout the corridor, and overall would not introduce additional water supply utilization. Through the planting of low/medium water use landscaping, use of reclaimed water for irrigation where feasible, and given the City's UWMP, which confirms adequate water supply for the project and other future development, the project would not result in a substantial increase in water demand such that water supplies would be affected during normal, dry, or multiple dry years. Therefore, impacts would be **less than significant**.

- c) *Would the project result in a determination by the waste water treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?***

Less than Significant Impact. As described above and in Section 2.2, the project corridor is fully built-out and urbanized. The project is a public infrastructure project, which proposes improvements described above under Section 3.19(a), that would enhance existing infrastructure without introducing new residential or commercial uses that could directly induce population growth and thereby result in an increase in wastewater treatment demands. As discussed in Section 3.14, the project would not be designed to accommodate or incentivize unplanned growth and would not substantially expand service capacity in a manner that could indirectly support population growth. Further, even if modest population growth were to occur due to implementation of the project, projected wastewater demand would be accounted for through regional growth projections and the City's General Plan, which also addresses utility service capacity, such that growth would be incremental and not be considered substantial (City of Imperial Beach 2024b). Additionally, long-term wastewater services are addressed in California American Water's

(the City's water provider) UWMP, which confirms adequate wastewater infrastructure and treatment capacity for foreseeable development (AMWater 2021). Improvements would not induce significant new development or increase allowable densities that are inconsistent with existing General Plan projections for population or utility providers or the UWMP. As such, the project would not generate a new population base that would increase demand for new or expanded utilities, or generation of wastewater, and impacts would be **less than significant**.

d) *Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Less than Significant Impact. As described above, the project corridor is fully built-out and no expansion of existing or new facilities are proposed that would result in the generation of solid waste in excess of state or local standards. However, the project would generate solid waste during construction from demolition and general debris. Generation of construction debris would be minimized in compliance with the City's construction and demolition recycling ordinance, as outlined in Chapter 8.38 of the City's Municipal Code, which mandates submittal of a waste management plan to achieve a 65% diversion rate. The City also has additional waste management and recycling programs to comply with state standards and reduce solid waste. The City has an exclusive franchise agreement with solid waste disposal and recycling services, including street sweeping, curbside trash and recycling, and household hazardous waste disposal, for residents and businesses (EDCO 2025).

Once operational, the project would not generate solid waste, and no need for preparation of or participation in a solid waste diversion plan would be required. The nearest landfill to the proposed project is the Miramar Landfill located at 5180 Convoy St in San Diego, California, which is approximately 20 miles north of the project. The Miramar Landfill has an estimated remaining capacity of approximately 11 million cubic yards (as of January 2020), with an estimate cease operation date of January 2031 (CalRecycle 2025). Therefore, the nearest landfill to the project has sufficient capacity to meet construction solid waste needs. Given the City's additional waste management programs, which reduce solid waste and promote recycling and diversion of waste, as well as the project's minimal contribution to solid waste during construction, and the capacity of surrounding waste infrastructure, impacts would be **less than significant**.

e) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Less than Significant Impact. Waste generation would only occur during construction of the proposed project. All construction generated waste would be properly disposed of in accordance with the waste disposal requirements of the City, County, and state. The collection, transportation, and disposal of solid waste generated by construction of the project would comply with all applicable federal, state, and local statutes and regulations. Under AB 939, the Integrated Waste Management Act of 1989, local jurisdictions are required to develop source reduction, reuse, recycling, and composting programs to reduce the amount of solid waste entering landfills. Local jurisdictions are mandated to divert at least 50% of their solid waste generation into recycling. Other state mandates that target recycling, organics diversion, and landfill reduction goals are AB 341, AB 1826, SB 1383, SB 1016, and AB 1594. The City's waste management programs and partnership with EDCO, as discussed above in Section 3.19(d), addresses and ensures compliance with these state reduction statutes and regulations. However, once operational, the project

would not generate solid waste. Therefore, impacts associated with federal, state, and local management and reduction statutes and regulations related to solid waste would be **less than significant**.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

The project site is located within the Local Responsibility Area (LRA) and does not contain any areas of low, moderate, or high fire hazard severity. There is land designated as Federal Responsibility Area north of Randow Drive, with land west of that area designated as having moderate and high fire hazard severities and falling within the LRA. The eastern side of the project site, specifically northeast of Georgia Street, includes land designated as having a moderate fire hazard severity. According to CAL FIRE, land north of the project site and extending along the length of the Palm Avenue corridor is designated as being within the Federal Responsibility Area (CAL FIRE 2025).

a) *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

Less than Significant Impact. The Emergency Operations Plan (EOP) for the City of Imperial Beach facilitates planned response to emergency and disaster situations within the City's jurisdiction. The EOP provides guidance and procedures for the City to prepare for, respond to, mitigate for, and recover from emergency situations associated with natural disasters and technological incidents. According to the City's Hazard Mitigation Annex, the city maintains an Emergency Operations Center (EOC) as part of its emergency

management infrastructure. The EOC is activated during major incidents and disasters to coordinate response efforts among city departments, regional agencies, and emergency services. Additionally, the City's Hazard Mitigation Annex is part of the Multi-Jurisdictional Hazard Mitigation Plan led by the County (County of San Diego 2023). The San Diego County EOP also plays a role in shaping and supporting the City's emergency planning efforts. The San Diego County EOP serves as a regional framework for emergency response. This framework is designed to be used by all jurisdictions within the county, including cities like Imperial Beach. The City of Imperial Beach is part of the San Diego Operational Area (OA), a structure defined under California's Standardized Emergency Management System (SEMS). During major emergencies, the County coordinates multijurisdictional response efforts, and the City of Imperial Beach operates within this system to ensure interagency coordination, resource sharing, and unified command. In large-scale incidents, the County provides logistical, technical, and personnel support to cities. This includes activating the County EOC, coordinating mutual aid, and facilitating communication with state and federal agencies (County of San Diego 2022). Public agencies involved in the County EOC include the California Office of Emergency Services (Cal OES), FEMA, San Diego County Fire Authority, local law enforcement and fire departments, and transportation agencies like SANDAG, among others (County of San Diego 2022).

As previously discussed, project-related construction activities would occur within the existing Palm Avenue ROW, and those actions would require temporary lane closures and detours during construction. Per the proposed project's traffic control and management plan requirements (see Section 3.17), temporary road closures would not occur along the entire project limits but rather in segments, as the proposed improvements advance along the corridor. Construction activities may also temporarily decrease vehicle lane capacity; however, any resulting lane closures would be coordinated with the City regarding requirements for traffic control measures to be implemented. Further, lane closures would also be coordinated with local emergency service providers to preserve access during the event of an emergency. This coordination is consistent with the City and County's EOP and the SEMS protocols, which require interagency communication and access preservation during emergency events (County of San Diego 2022). The project's post construction improvements would include lane reductions, widened sidewalks, Class IV protected bike lanes, upgraded or relocated bus stops, reconfigured on-street parking, minor modifications to driveways and alley entrances, realignment of certain intersections to improve safety and operational efficiency (see Figure 3.10-1), the installation of protected intersections (see Figure 3.10-1), high-visibility crosswalks, and ADA-compliant curb ramps, drainage improvements/enhancements, and various aesthetic and landscape enhancements. The roadway improvements and traffic signal modifications would be subject to applicable design and engineering standards used by the City. 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 per applicable City standards and the CA Manual of Uniform Traffic Control Devices (MUTCD).

Additionally, in the event of an emergency, the City would respond according to the identified circumstances, consistent with the EOP and EOC direction received from their internal systems and/or in compliance with instructions provided by the County EOC, as well as other public agencies tasked with emergency response. As discussed above, these agencies include Cal OES, FEMA, and regional emergency service providers, which operate under the EOP and EOC. In the event of an emergency, the project would rely on these agencies and service providers for fire protection, including the Imperial Beach Fire-Rescue

Department station located 0.53 miles south of the project, as described in Section 3.15, Public Services. As such, the project would comply with City and County adopted emergency plans and protocols, rely on emergency service providers consistent with adopted plans, and implement traffic control measures to preserve emergency access in case of an emergency. Therefore, the project would not substantially impair or interfere with evacuation plans or the established emergency operation plans and impacts would be **less than significant**.

- b) ***Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?***

Less than Significant Impact. As summarized in Section 2.2, the project site is located within an urbanized area of the City that is without significant slopes and is bordered to the north by the San Diego Bay National Wildlife Refuge and the Otay River. As also described above, the project site does not fall within a fire hazard severity area but is surrounded by Federal Responsibility Area with moderate to high fire hazard severity zones (CAL FIRE 2025). The project site is in a relatively flat and heavily urbanized area surrounded by infrastructure and impervious surfaces. Like much of Southern California, the project site is also influenced by prevailing wind patterns. Prevailing winds are winds that blow from a single direction over a specific area of the Earth. The predominant average hourly wind speed and direction in the City varies throughout the year. The prevailing wind pattern is from the west (on shore), but the presence of the Pacific Ocean causes a diurnal wind pattern known as the land/sea breeze system. During the day, winds are from the west-southwest (sea) and at night, winds are from the northeast (land). During the summer season, the diurnal winds may average slightly higher than the winds during the winter season due to greater pressure gradient forces. Surface winds can also be influenced locally by topography and slope variations. The project site does not include topography or slope variations that would create unusual weather conditions, such as high wind velocities, which would lead to increased fire risk. The project is a Public Works road improvement project and would not include habitable structures or permanent occupants. As such, project occupants would be limited to workers on site during project construction, as well as passing motorists and pedestrians during construction and operation.

Construction

Construction of the project would occur predominantly within the existing paved ROW for Palm Avenue and would not substantially alter on-site slopes, influence prevailing winds, or other factors that could exacerbate wildfire risk. However, project construction would introduce potential ignition sources to the project site including the use of vehicles, heavy machinery, and accidental human-caused ignitions. The project would be conducted in accordance with the local and state regulations governing fire protection and safety, such as the City-adopted 2019 California Fire Code, with local amendments, in which the project would be required to comply with all fire code regulations. Any equipment operated within the project site would be required to have a qualified spark arrestor or equivalent fire prevention device, consistent with CFC Chapter 3 guidelines. To limit the possibility of accidental ignition, smoking would be prohibited in areas where flammable or combustible materials exist, including vegetative fuel beds or construction debris, in accordance with CFC Section 310. Signage and enforcement of this prohibition would be required throughout the duration of construction. In addition to regulatory compliance, the City would implement standard best practices to minimize fire risk. During Red Flag Warnings and High to Extreme Fire Danger days, Public Works would be empowered to limit or pause construction activities. Red Flag Warnings entail warm temperatures, low humidities, and strong winds that increase risk of fire danger (National Weather

Service 2025), and High to Extreme Fire Danger Days are part of the National Fire Danger Rating System, in which fires are likely (high), start easily (very high), or will start and spread rapidly (extreme) (National Park Service 2025). Implementing standard best practices such as the restriction or suspension of construction activities that could generate sparks or heat on these days would reduce the risk of wildfire.

Operation

Currently, Palm Avenue is located within an urbanized area of the City and is classified as a state-maintained highway segment for SR-75 and I-5. It serves as a vital east-west arterial for the community and provides connections to regional transportation initiatives, such as the Bayshore Bikeway. The operational purpose of Palm Avenue would largely remain the same once construction is completed. The purpose of the project is to transform the corridor into a safer, more accessible multimodal corridor, including congestion relief, which would allow for more efficient usage of Palm Avenue. In turn, this may reduce the potential for wildfire ignitions as a result of motor vehicle accidents. Further, the widening of sidewalks would introduce more hardscape in a flammable vegetative area and potentially serve as a fuel break. The proposed additional landscaping would introduce more flammable vegetative area. However, the project would ensure the planting of drought-tolerant and shade-providing vegetation throughout the corridor. Further, the risk of wildfire during Santa Ana winds, which are hot and dry winds that increase wildfire hazards, would be offset by the irrigation and maintenance of the landscaping and compliance with the CBC and CFC as adopted by the City. Therefore, the operation of the project would not substantially alter on-site slopes, influence prevailing winds, exacerbate wildfire risk, or introduce new ignition sources.

The site plans and emergency access for the proposed project would be reviewed by the Imperial Beach Fire Department and would be following the applicable Fire Code. Due to existing development in the vicinity, the relatively flat topography of the site and lack of slopes that would exacerbate fire risk, and updated building standards as part of the development, implementation of the proposed project is not expected to exacerbate wildfire risks and thereby expose proposed project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Further, as the project is improving an existing roadway, the risk from a wildfire under operational conditions is already known under existing conditions, and Public Works would provide routine maintenance of the road. As previously discussed, in the event of an emergency, the City would respond according to the identified circumstances, consistent with the EOP and EOC direction received from their internal systems and/or in compliance with instructions provided by the County EOC, as well as other public agencies, such as Cal OES and regional emergency service providers, tasked with emergency response. Additionally, as discussed in Section 3.15, the project would not alter service ratios, and the project site would be served by the Imperial Beach Fire-Rescue Department. The project would therefore adhere to emergency protocols and fire codes to ensure that, during operation, the project would not exacerbate wildfire risks or increase exposure to wildfire-related pollutants. As such, impacts would be **less than significant**.

- c) ***Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***

Less than Significant Impact. The project would involve the construction and operation of new infrastructure within the defined limits of the existing Palm Avenue corridor. The majority of project construction would occur within the boundaries of the existing ROW and would not include the need for off-

site construction activities. The project would involve improvements to Palm Avenue to engineer lane reductions, widen sidewalks, install Class IV protected bike lanes, upgrade or relocate bus stops, reconfigure on-street parking, add minor modifications to driveways and alley entrances, realign certain intersections to improve safety and operational efficiency, install of protected intersections, high-visibility crosswalks, and ADA-compliant curb ramps, add drainage improvements/enhancements, and add various aesthetic and landscape enhancements. These improvements are anticipated to reduce excessive speeds and organize space, not to restrict emergency access or exacerbate risk that would correspondingly result in environmental impacts.

Construction of associated infrastructure would be conducted in accordance with the plans and policies discussed under Section 3.9(g), Hazards and Hazardous Materials and local and state regulations governing fire safety, as discussed under Section 3.20(b). Construction of all improvements would be required to be in conformance with the California Building Code (which includes the California Fire Code). The proposed project, through both construction and operation, would introduce potential ignition sources to the project site, including the use of heavy machinery and the potential for sparks during welding activities or other hot work. Although the project's fire risk is considered low, the potential to exacerbate fire risk could occur during construction, and operation. However, the project would comply with CFC Chapter 33 Fire Safety During Construction and Demolition designating fire safety measures to reduce the possibility of fires during construction activities. CFC Chapter 33 includes the following measures: fire watch/fire guards during hot works and heavy machinery activities, spark arresters on all equipment, requiring fire access during construction, water supply via hose lines attached to hydrants or a water tender pursuant to Oceanside Fire Department requirements, red flag period restrictions, required on-site fire prevention resources, and others. Additionally, the City would implement standard BMPs to minimize fire risk, which include vegetation management, routine maintenance of roadways, and adherence to fire safety design standards (County of San Diego 2022).

Construction and operation of the project would generate the need for new or altered facilities as discussed in Section 3.19, Utilities and Service Systems. The project activities involved with the installation or maintenance of infrastructure that require ground disturbance and the use of heavy machinery associated with trenching, grading, site work, and other construction/maintenance activities and could result in a temporary or ongoing impact on the environment. However, the proposed corridor improvements would be within the existing Palm Avenue corridor ROW and require only limited and temporary construction-related activities outside of those limits. The project proposes to convert an existing open trapezoidal drainage channel, located at the northwestern limits of the project (see Figure 3.10-1a, 3.10-1b, and 3.10-1c), into a culvert with the existing channel filled up to grade with the roadway profile. The less-than-significant impacts associated with this proposed project feature are discussed in Section 3.4. The project also proposes minor impacts to an existing drainage inlet and outlet at the eastern limits of Palm Avenue, on both the south and north sides of the road, respectively. The areas immediately adjacent to the inlet and outlet will involve some ground-disturbing activities; however, the impacts would be temporary and the areas will be fully restored (see Section 3.4). Based on the limited scope of the proposed project features and footprint the potential for exacerbation of fire risk would be negligible and temporary impacts associated with project implementation minimized. Therefore, any potential or ongoing environmental impacts related to the components of the proposed project that may have exacerbated fire risks have been accounted for and analyzed as part of the impact assessment conducted for the whole of the project. Additionally, the project would be required to comply with all regulatory requirements associated with project installation and the potential for increased fire risks, including emergency protocols, fire codes, and

BMPs, as discussed in previous sections. No adverse physical effects beyond those already disclosed and mitigated would occur because of the implementation of the project's associated infrastructure. Based on compliance with the San Diego County Fire-imposed conditions, implementation of standard measures to reduce fire risk, and adherence to regulatory requirements, the installation and maintenance of associated infrastructure would not exacerbate wildfire risk or result in impacts to the environment beyond those already disclosed throughout this document, the impacts would be **less than significant**.

d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

Less than Significant Impact. As identified in the City's General Plan and discussed in Section 3.7, Geology and Soils, landslides are not considered a significant hazard due to the relatively flat topography and lack of slopes (City of Imperial Beach 2024b). The nearest active fault is the Silver Strand section of the Newport Inglewood Rose Canyon fault zone, located approximately 1.75 miles west of the project (Kennedy and Tan 2008). This fault has the potential to generate a Magnitude 6.99 seismic event, though the probability of surface rupture at the site is considered very low. Project construction and operation would not increase or exacerbate the potential for fault rupture to occur. Generally, the San Diego region has historically been seismically quiet, and there have been no known active landslides that have occurred on or adjacent to the Project site, and land is expected to be globally stable (DOC 2025d; CGS 2011). Further, the project does not include activities that would induce post-fire slope instability, such as prescribed burning. Given that the project consists of multimodal transportation and streetscape improvements within a fully urbanized corridor, the proposed enhancements would not result in abnormal or heightened conditions related to runoff or post-fire slope instability.

The project site and surrounding areas are relatively flat. Slope failure, mudflows, and landslides are common in areas with steep hillsides and embankments that can be exacerbated in a post-fire environment. However, as stated previously, the project site does not have these geographic features, and the City would not be subject to downslope or downstream flooding as a result of post-fire instability or changes to drainage patterns. As stated previously, the proposed project improvements would involve limited grading and are not expected to cause slope instability, thereby resulting in substantial soil erosion or loss of topsoil. Given the fully urbanized and highly paved condition of the project corridor and the summary analysis presented above, the risk of exposing people and/or structures to the significant risk associated with post-fire instability would be less than significant.

Local flooding could be intensified by development as a result of paving. However, as discussed in Section 3.9, the project would not result in a net increase of impervious surfaces; rather it would introduce additional landscaping along the extent of Palm Avenue affected by the project. The project proposes improvements to the drainage systems along Palm Avenue and is not expected to increase the rate of surface runoff, impact existing drainage patterns, or result in off-site or on-site flooding. During operation, Palm Avenue would operate similar to existing conditions, with storm drainage systems sized to adequately handle stormwater flows consistent with Public Works design standards. The project hardscape and proposed landscaping would reduce potential for erosion during operation. Therefore, the project would not expose people or structures to significant risks as a result in the alteration of the existing drainage patterns.

Given the nature of the project site and the make-up of the proposed improvements as a whole, the projects' potential to expose people or structures to downslope/downstream flooding, or landslides as a result of runoff, post-fire slope instability, or drainage changes would be **less than significant**.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

- a) ***Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?***

Less than Significant Impact With Mitigation Incorporated. As discussed in Section 3.4, construction of the proposed project would potentially result in significant impacts to biological resources. However, with incorporation of MM-BIO-1 through MM-BIO-4, all potentially significant impacts would be reduced to a level below significance. The proposed project would not substantially degrade the quality of the environment, impact bird, fish or wildlife species, or sensitive plant or habitat communities. As discussed in Section 3.5, Cultural Resources, and Section 3.18, Tribal Cultural Resources (PENDING), potential impacts regarding unknown intact archaeological resources and TCRs that could be encountered during ground-disturbing activities within native soils. However, with implementation of MM-CUL-1 through MM-CUL-3, impacts would be reduced to less than significant. Overall, impacts would be **less than significant with the incorporation of mitigation**.

- b) *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)*

Less than Significant Impact with Mitigation Incorporated. As provided in the analysis presented throughout the Chapter 3 analysis, the proposed project would not result in significant impacts to Aesthetics, Agriculture and Forestry Resources, Energy, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Transportation, Utilities and Service Systems. Mitigation measures recommended for Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Noise, and Tribal Cultural Resources would reduce impacts to below a **level of significance with mitigation incorporated**.

The proposed project would incrementally contribute to cumulative impacts for projects occurring within the vicinity of the project site. With mitigation, however, implementation of the proposed project would not result in any residually significant impacts that could contribute to a cumulative impact. In the absence of residually significant impacts, the incremental accumulation of effects would not be cumulatively considerable and would be **less than significant**.

- c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Less than Significant Impact with Mitigation Incorporated. The potential for adverse direct or indirect impacts to human beings was considered throughout Chapter 3 of this IS/MND. Based on this evaluation, there is no substantial evidence that construction or operation of the proposed project with the proposed mitigation measures incorporated would result in a substantial adverse effect on human beings. Impacts would be **less than significant with incorporation of mitigation measures**.

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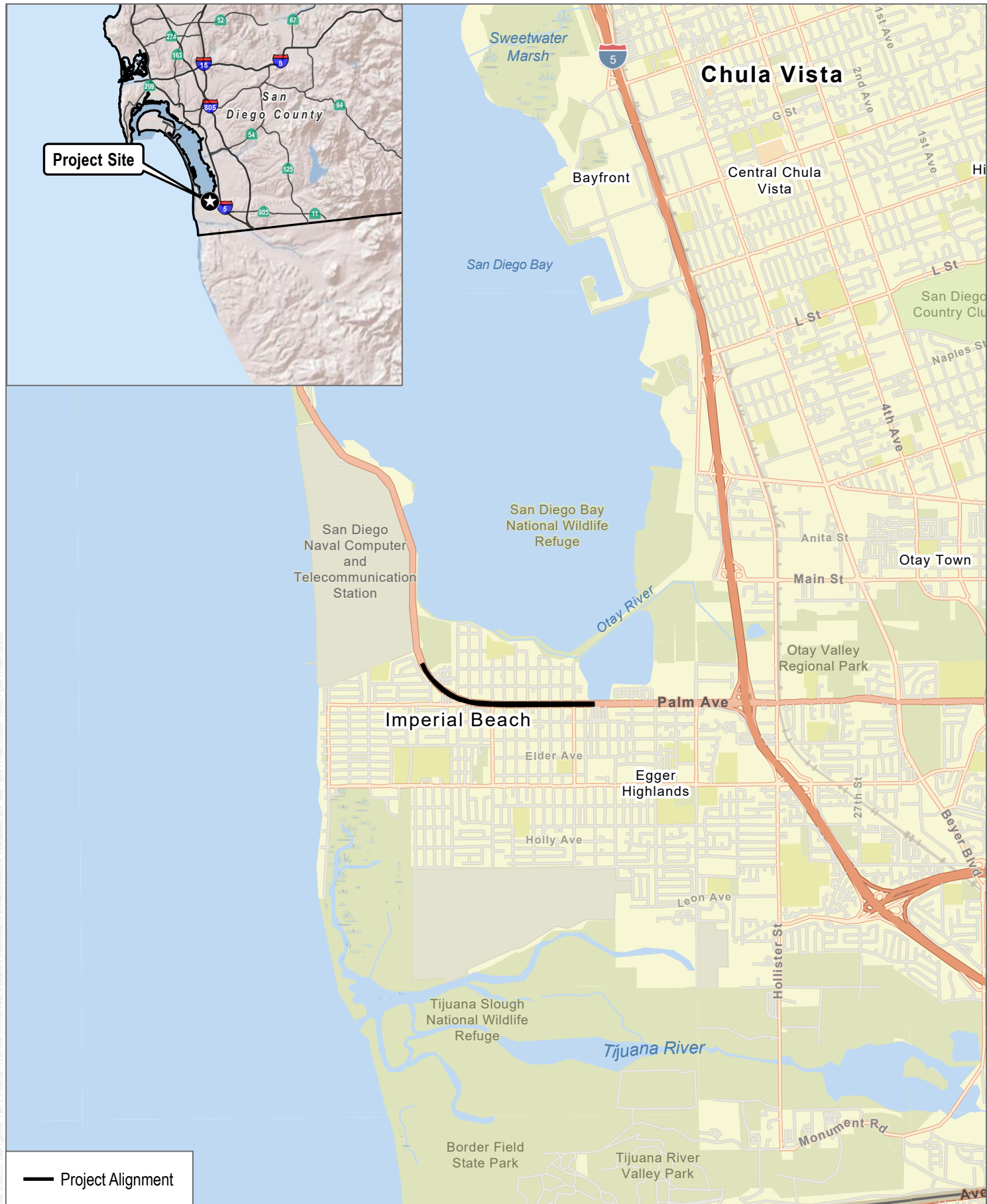
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4.2 List of Preparers

Dudek

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SOURCE: Esri World Street Map

DUDEK



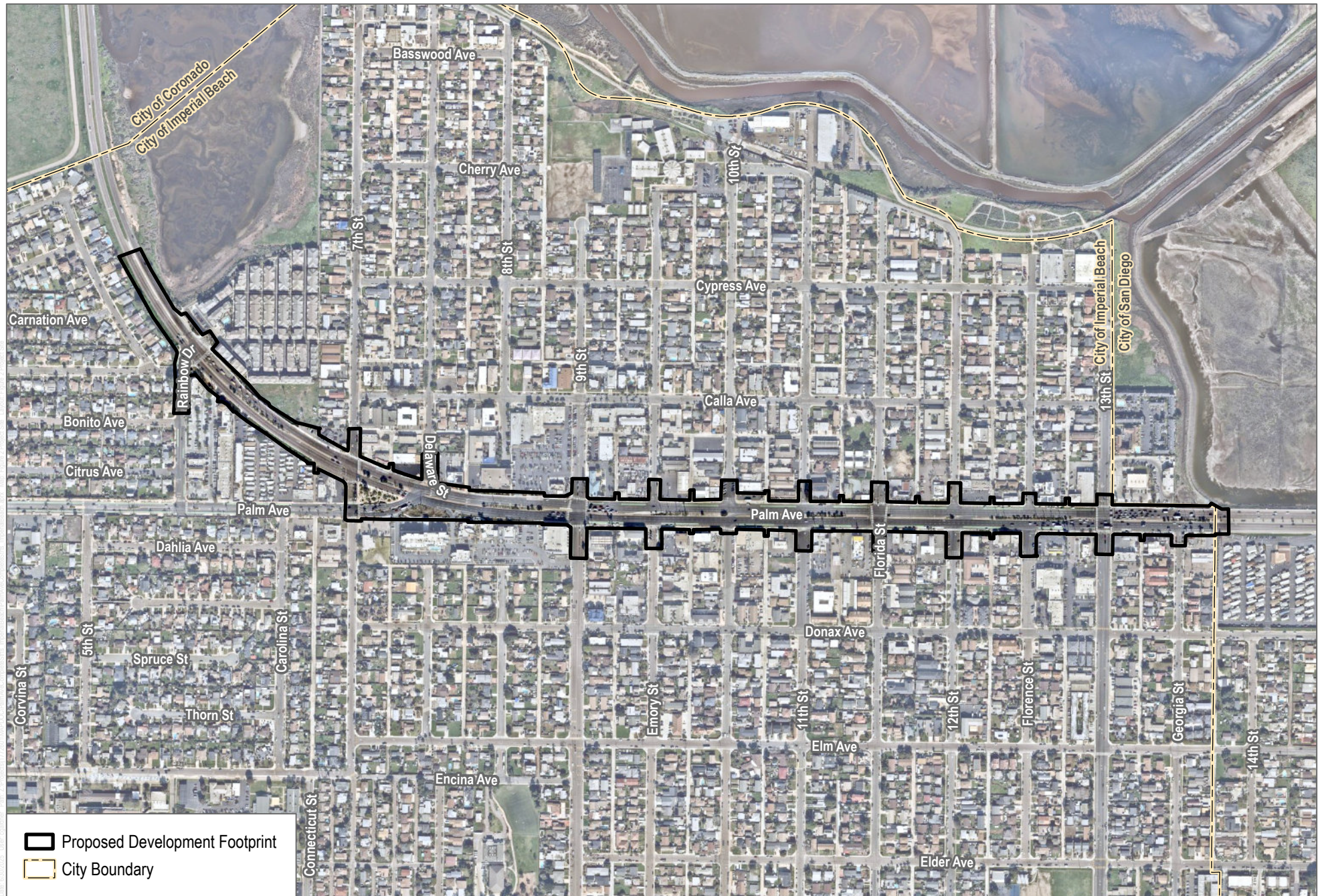
0 2,000 4,000 Feet

FIGURE 2-1

Project Location

Palm Avenue Complete Multimodal Corridor Project

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SOURCE: SanGIS 2023

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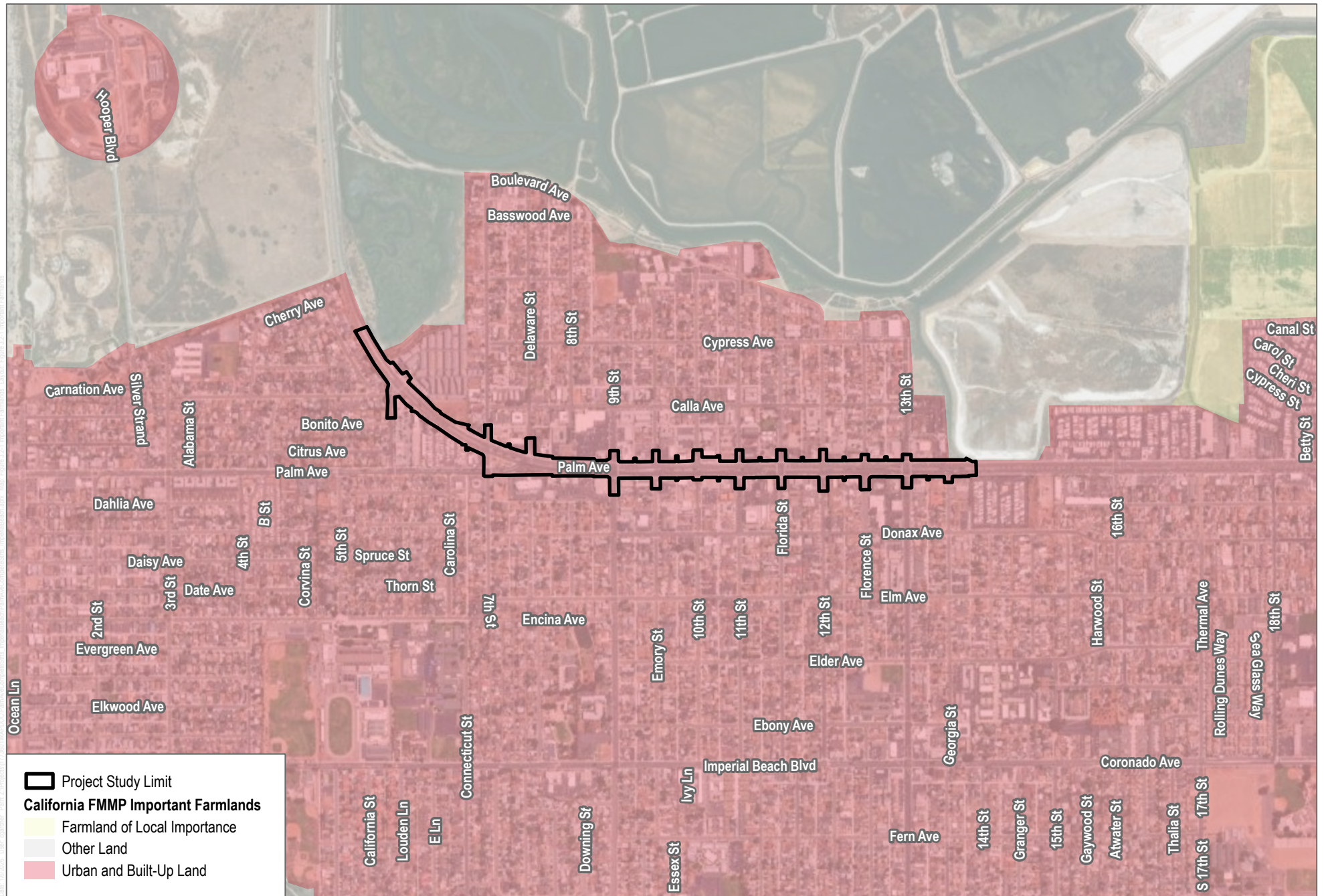


0 325 650 Feet

FIGURE 2-2
Project Site

Palm Avenue Complete Multimodal Corridor Project

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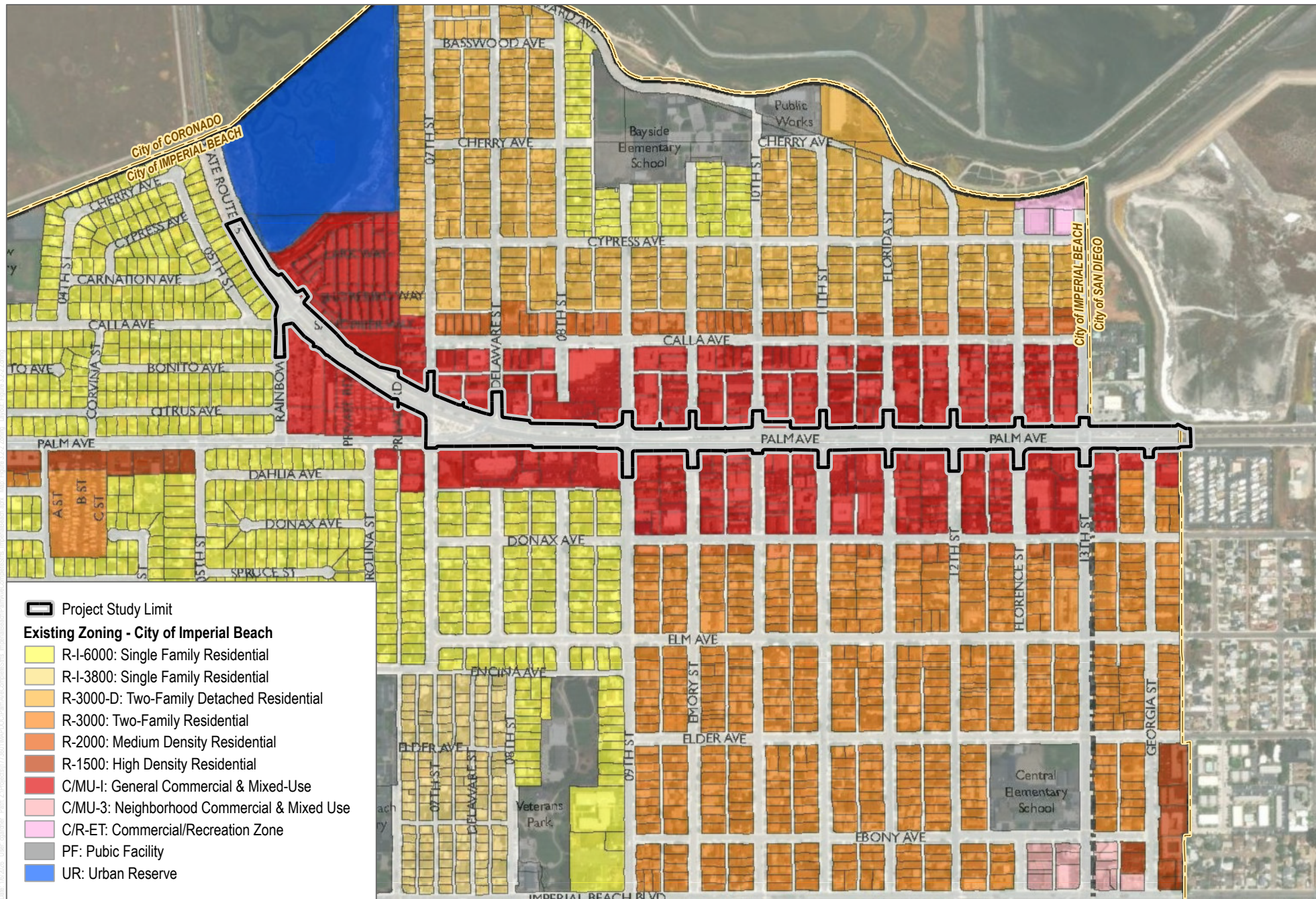


SOURCE: Esri Basemap 2024; Open Street Map 2023; CA Dept. of Conservation 2020

FIGURE 3.2-1
Important Farmlands

City of Imperial Beach Palm Avenue Complete Multimodal Corridor Project IS/MND

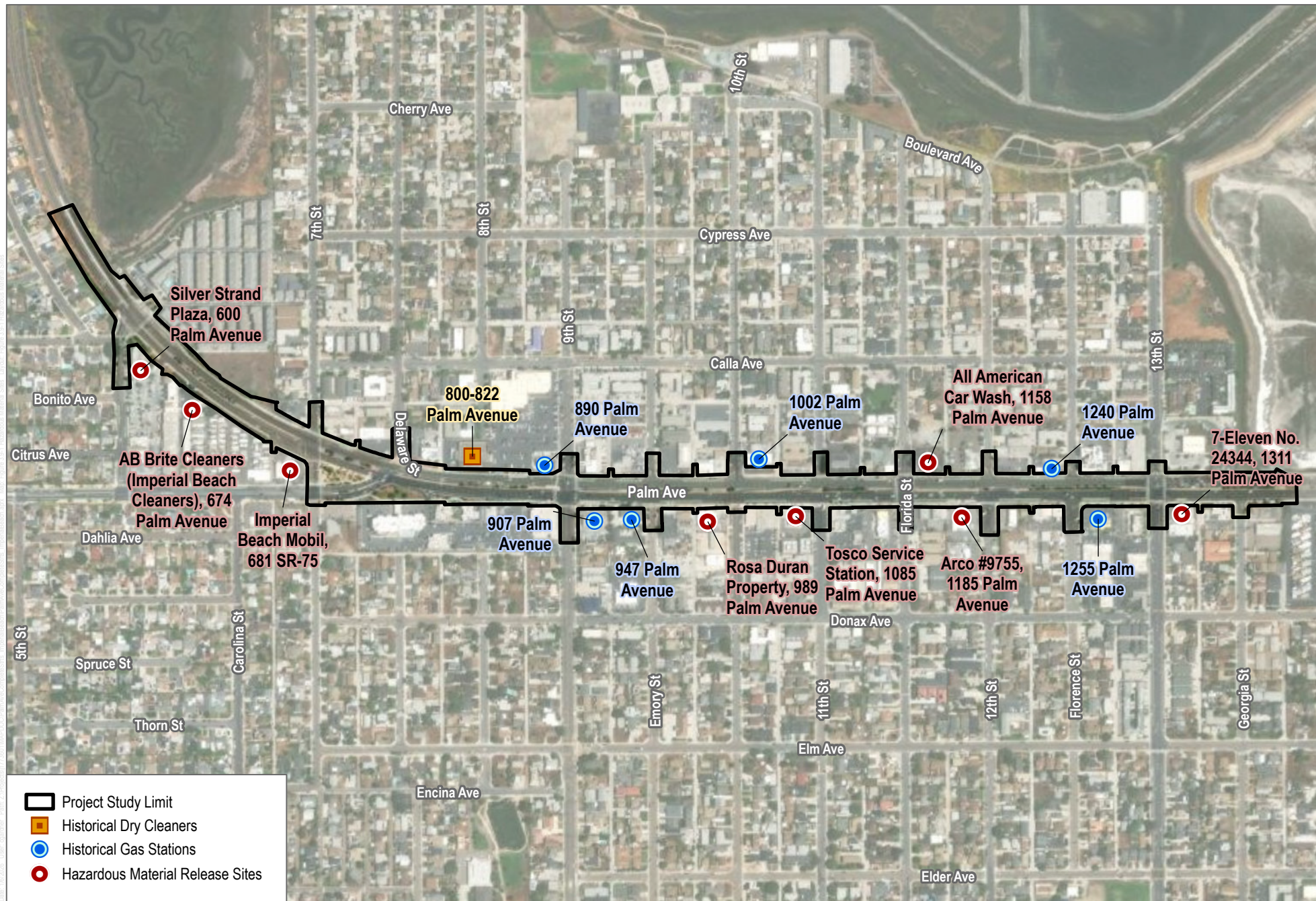
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SOURCE: Esri Basemap 2026; Open Street Map 2023; SANDAG 2026; City of Imperial Beach 2026

FIGURE 3.2-2
Zoning

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SOURCE: Esri Basemap 2024; Open Street Map 2023

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0 287.5 575 Feet

FIGURE 3.9-1
Hazardous Material Sites

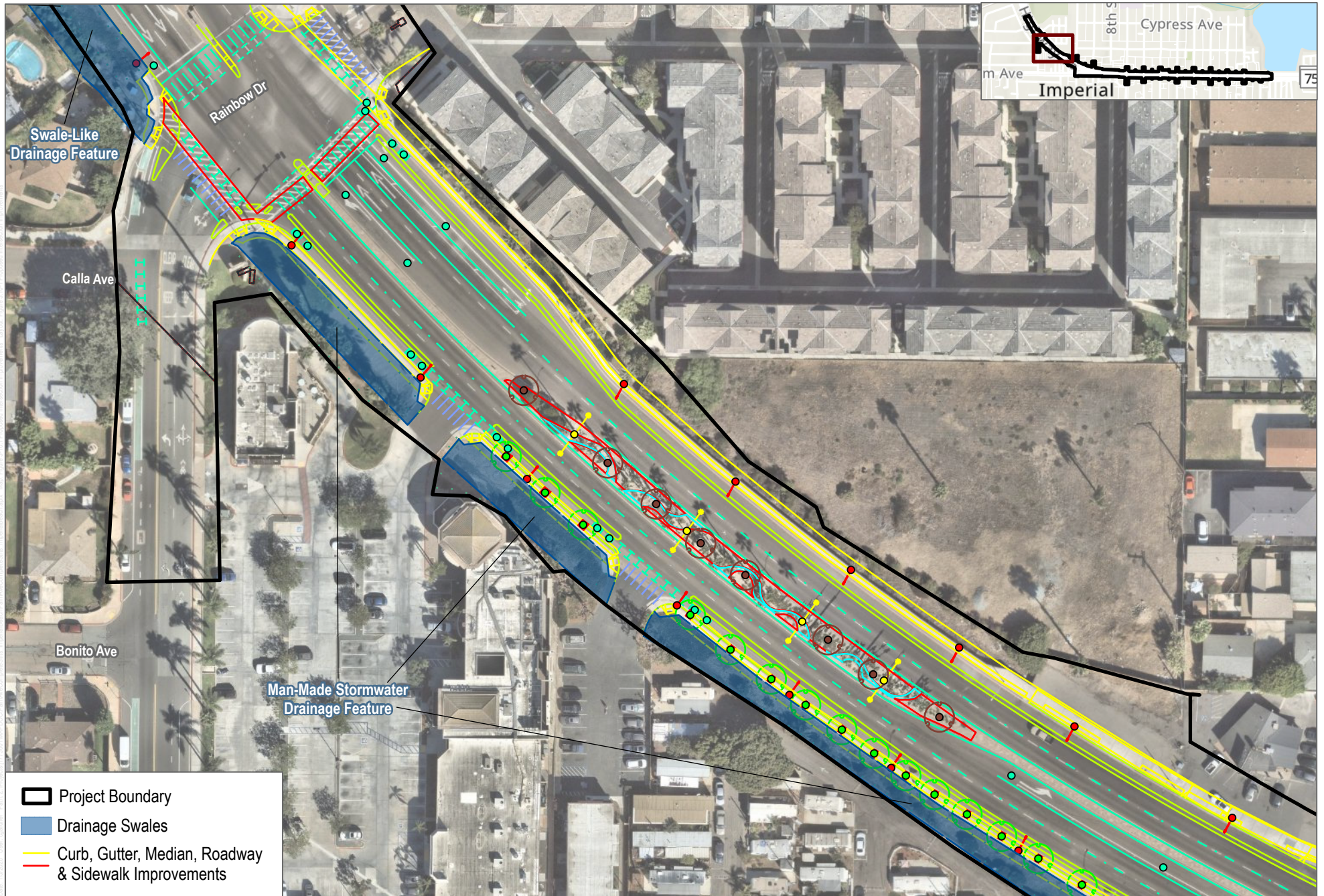
City of Imperial Beach Palm Avenue Complete Multimodal Corridor Project IS/MND

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SOURCE: Nearmap 2026; Open Street Map 2024

INTENTIONALLY LEFT BLANK



SOURCE: Nearmap 2026; Open Street Map 2024

FIGURE 3.10-1b

Proposed Intersection Improvements

City of Imperial Beach Palm Avenue Complete Multimodal Corridor Project IS/MND

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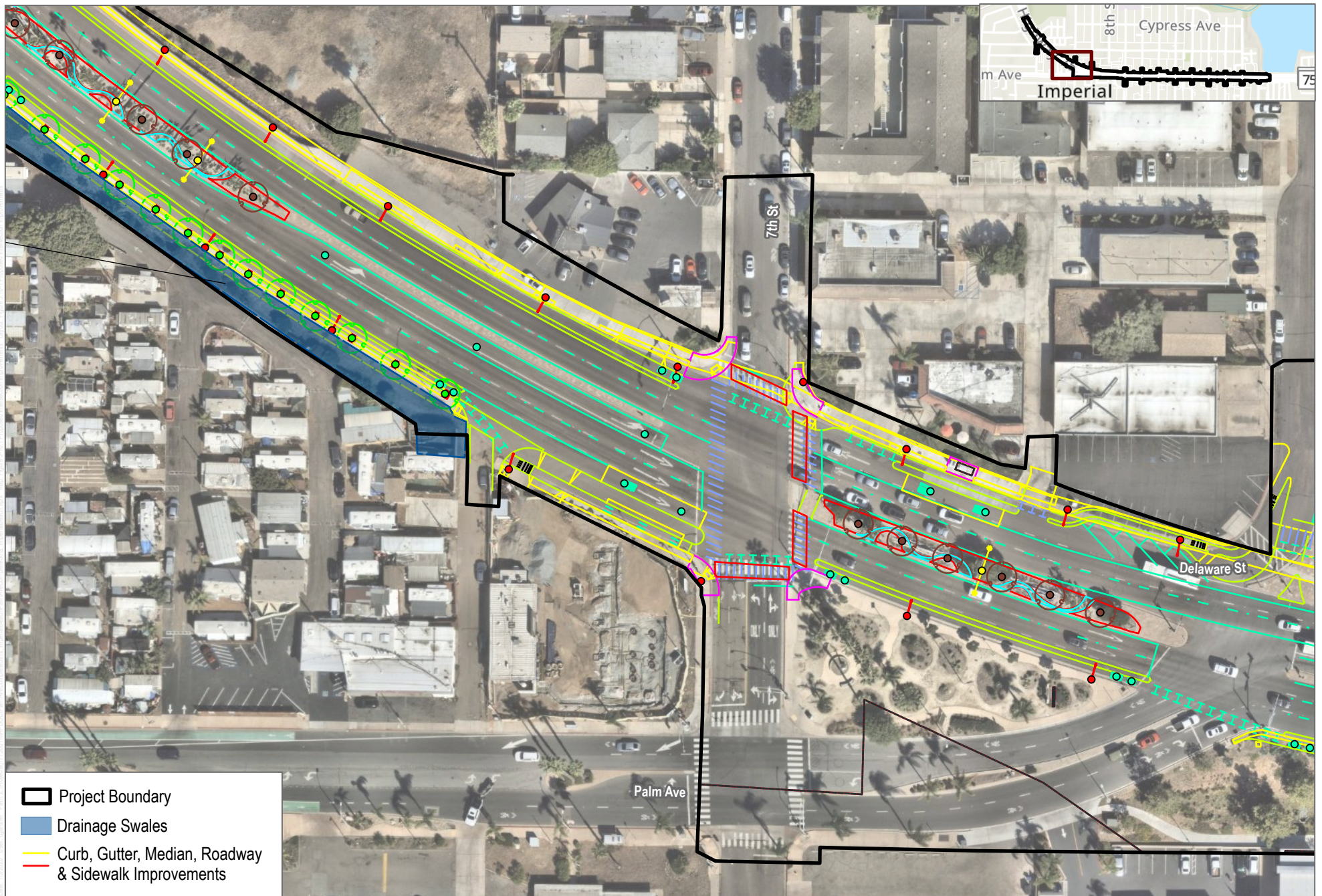
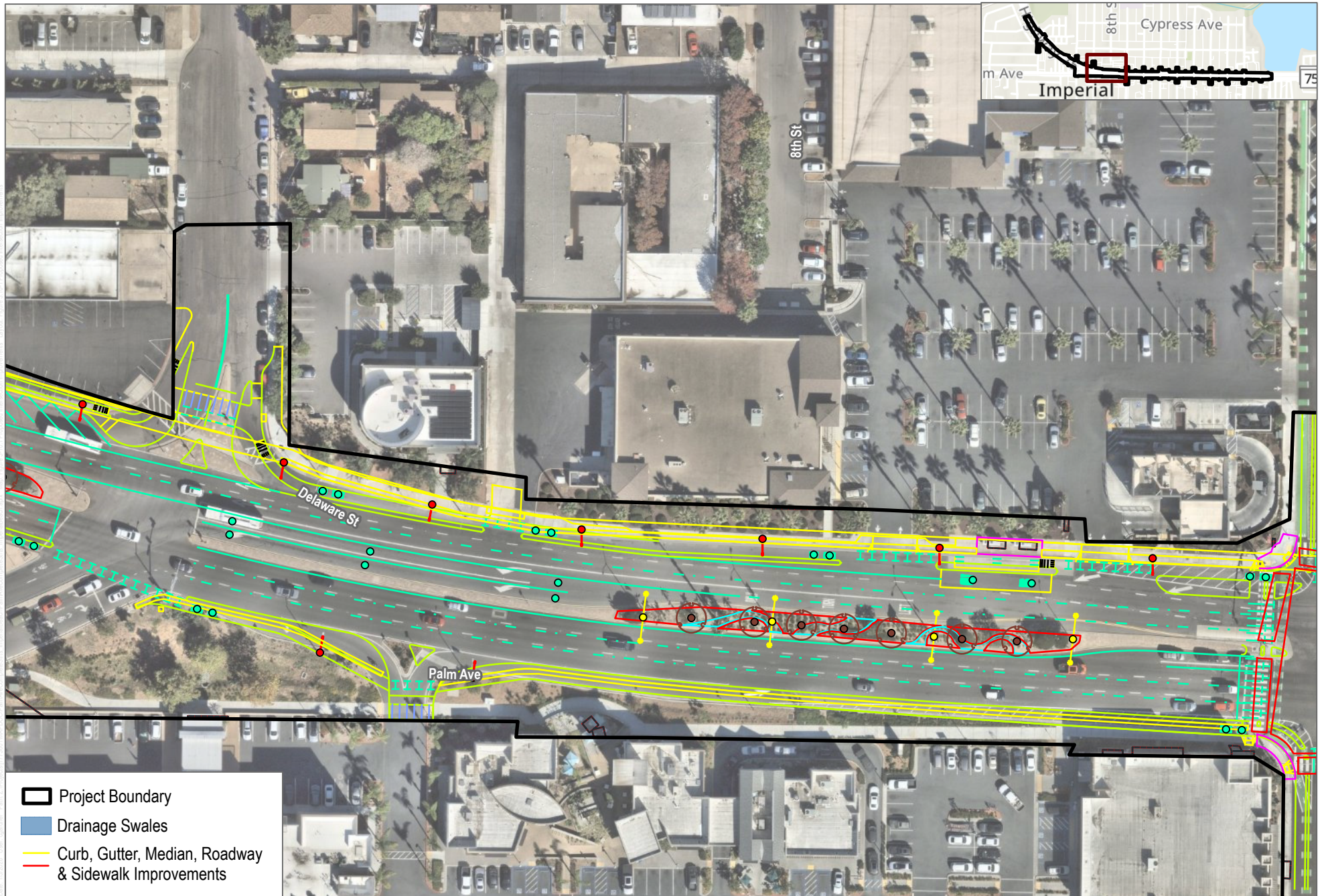


FIGURE 3.10-1c

Proposed Intersection Improvements

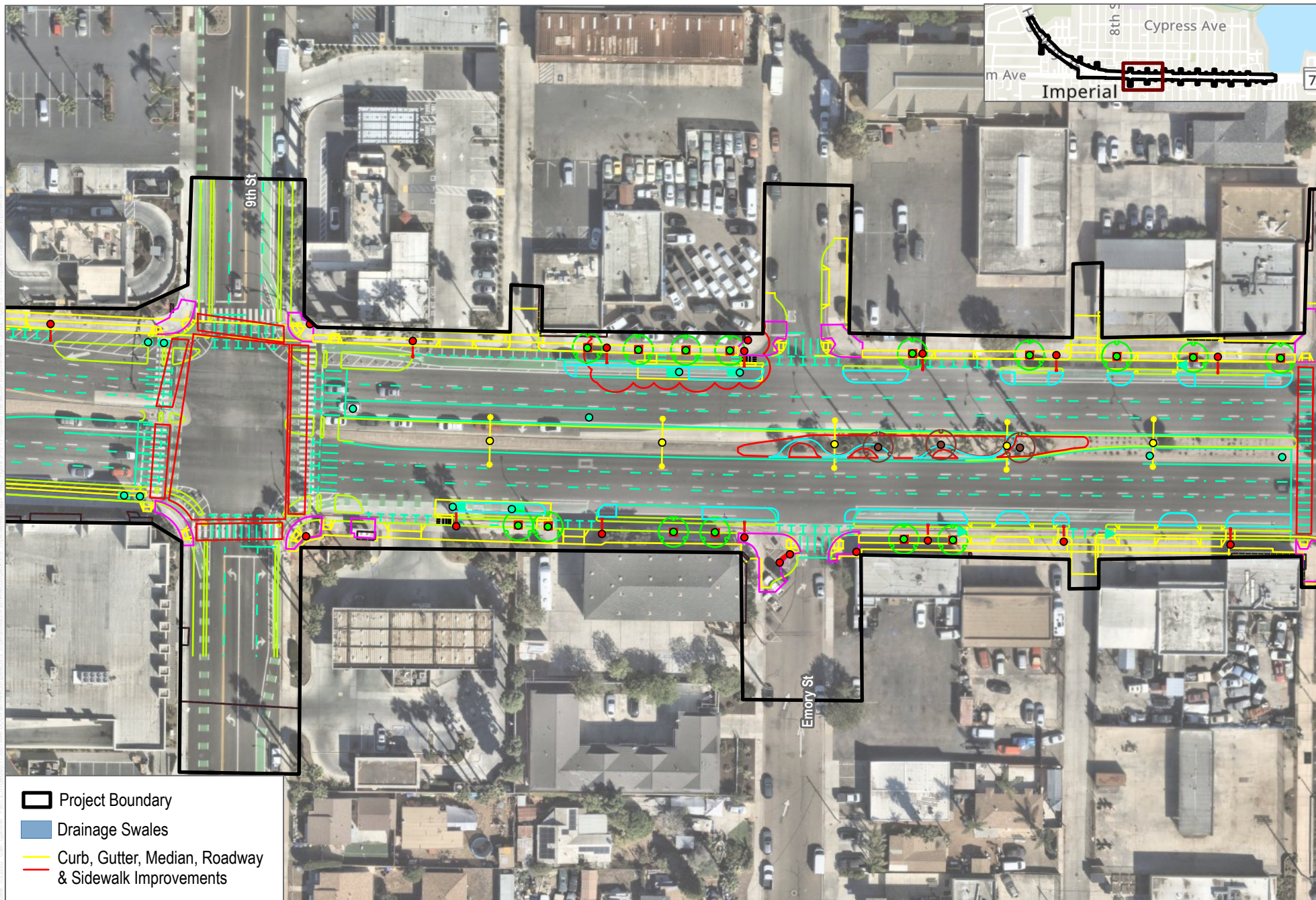
City of Imperial Beach Palm Avenue Complete Multimodal Corridor Project IS/MND

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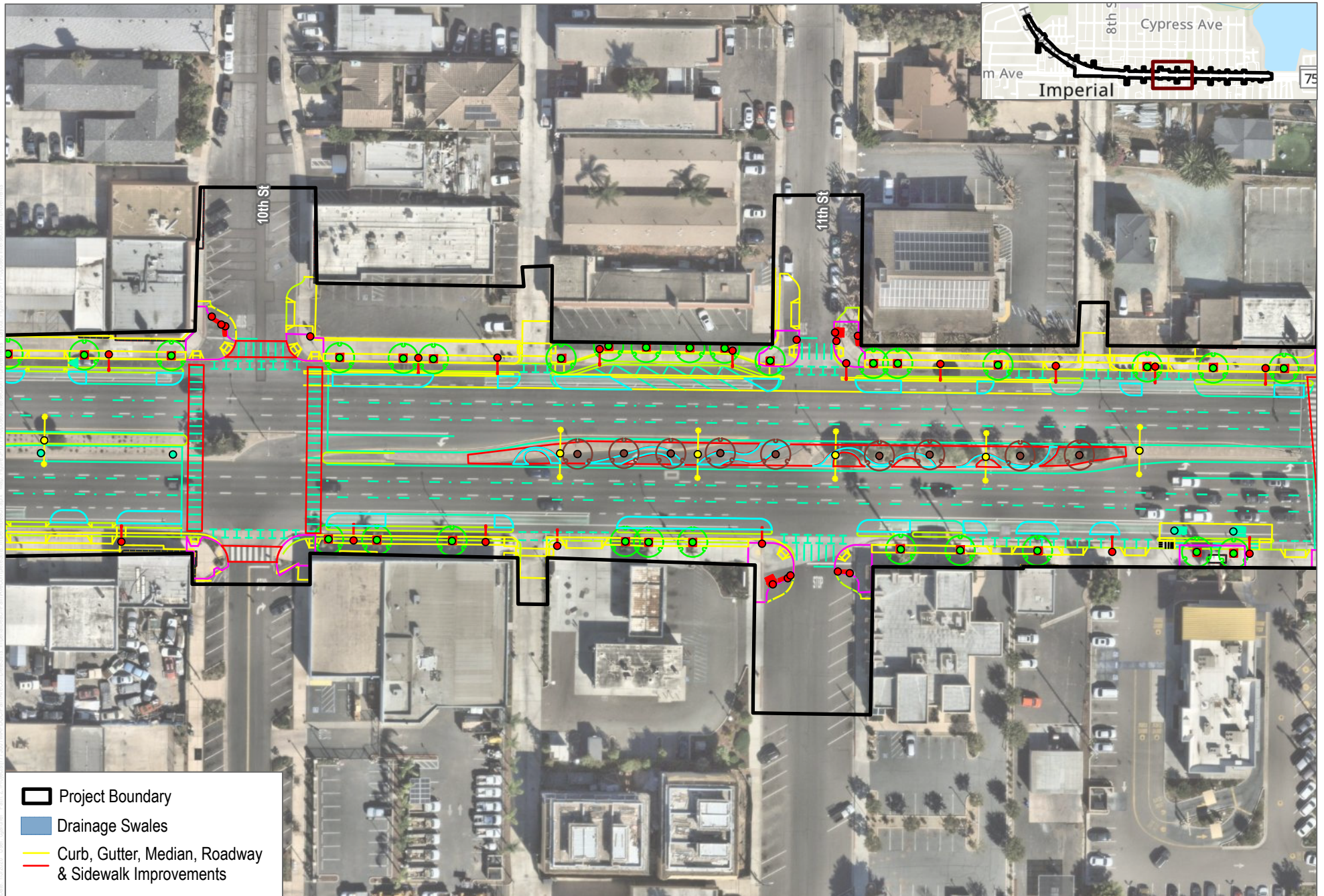
SOURCE: Nearmap 2026; Open Street Map 2024

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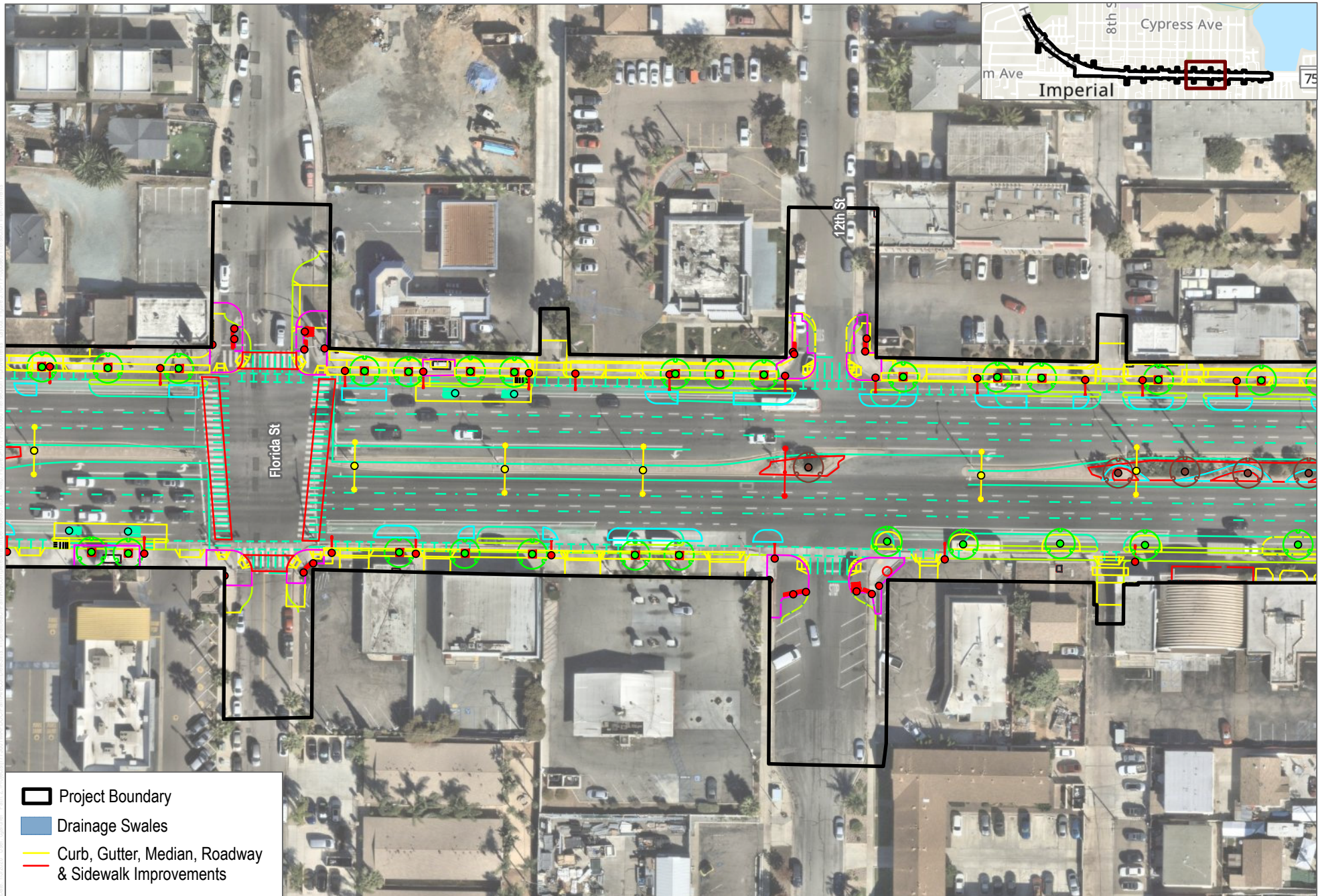
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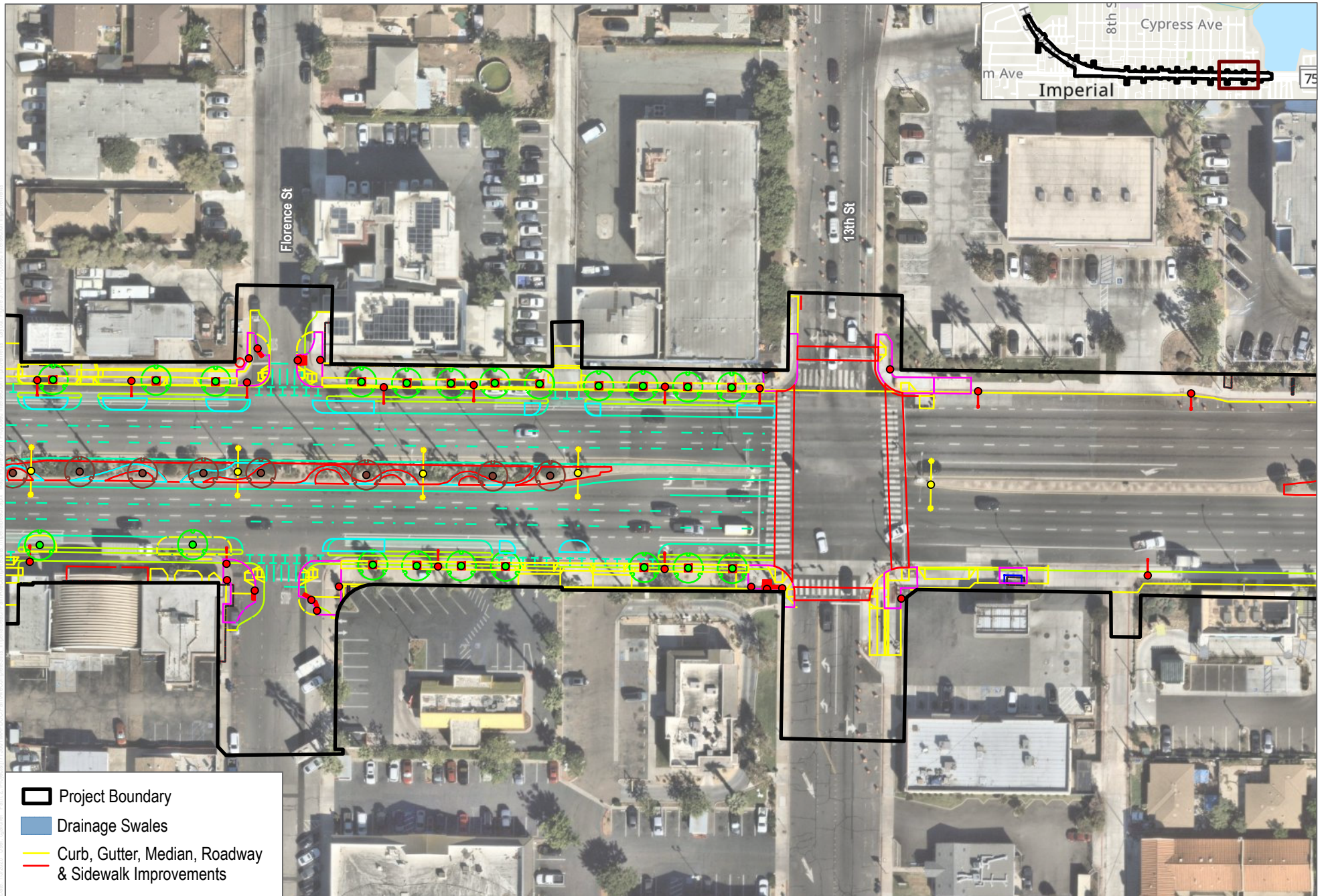
SOURCE: Nearmap 2026; Open Street Map 2024

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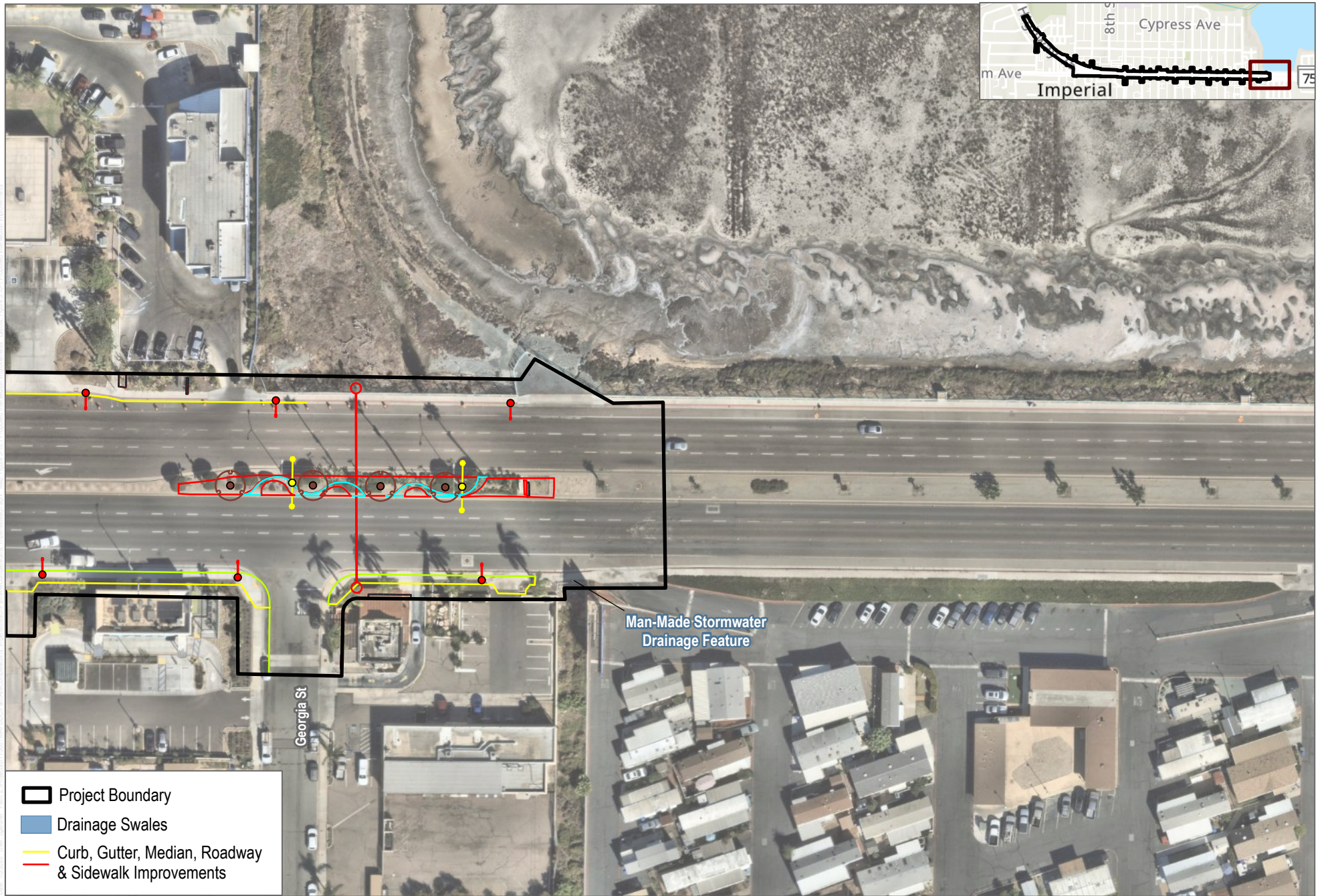
SOURCE: Nearmap 2026; Open Street Map 2024

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SOURCE: Nearmap 2026; Open Street Map 2024

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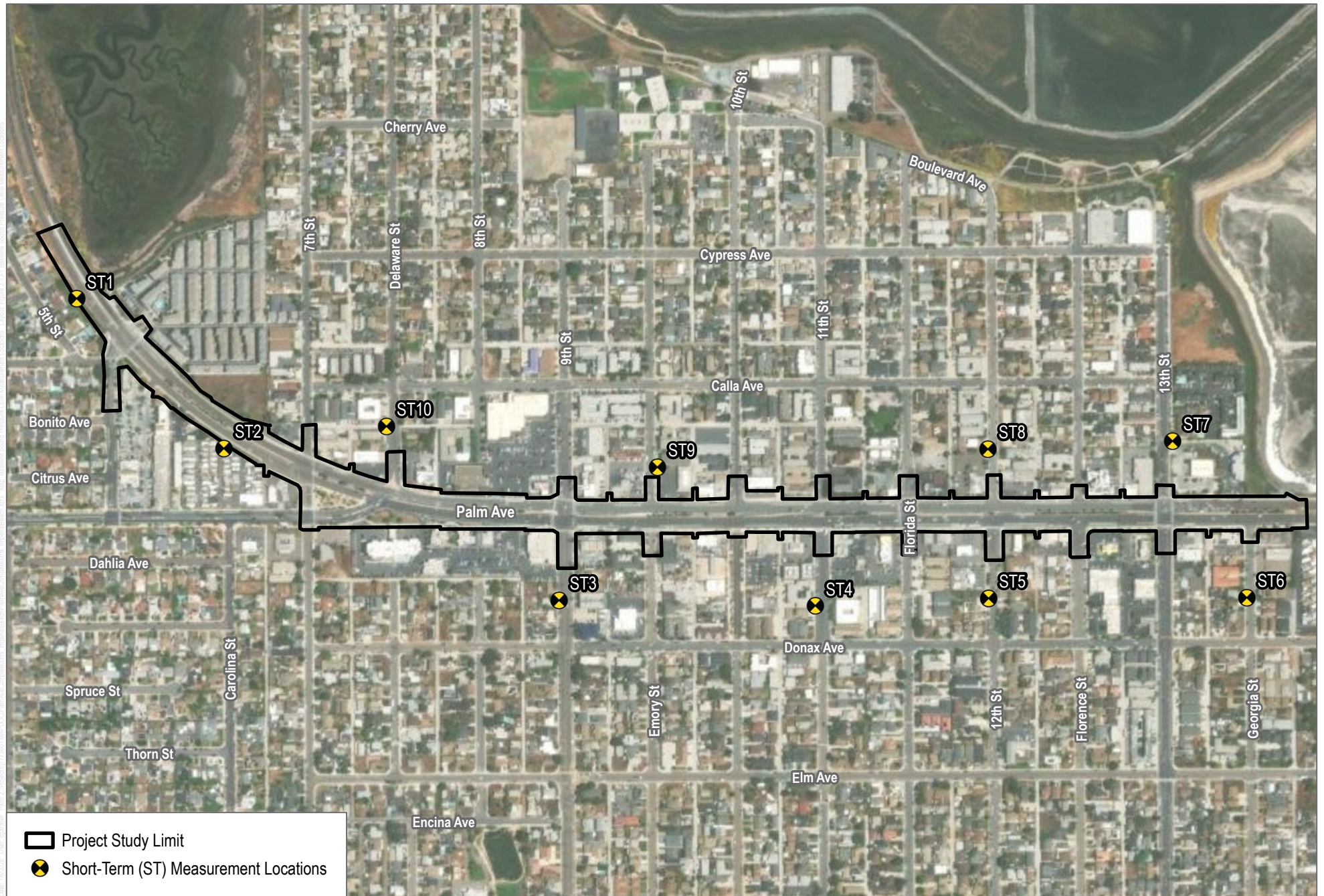


SOURCE: Nearmap 2026; Open Street Map 2024

FIGURE 3.10-1i

Proposed Intersection Improvements

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SOURCE: Esri Basemap 2024

DUDEK



0 285 570 Feet

FIGURE 3.13-1
Baseline Sound Pressure Level Measurement Locations
 City of Imperial Beach Palm Avenue Complete Multimodal Corridor Project IS/MND

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