Attachment 3

ADDENDUM TO THE GENERAL PLAN EIR

SCH No. 2010011011

FOR THE

Circulation Element Update

City of Hesperia

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1. Addendum to the Adopted General Plan EIR for Minor Modifications to the Circulation Element

1.1 BACKGROUND AND OVERVIEW

This document is an Addendum to the previously certified Environmental Impact Report (EIR) (State Clearinghouse [SCH] No. 2010011011) for the Hesperia General Plan, which was certified on September 8, 2010 (referred to as the "existing General Plan"). The purpose of this Addendum is to evaluate whether the proposed update to the Circulation Element ("Proposed Project") would modify the existing General Plan in such a way as to result in new environmental impacts or a substantial increase in the severity of previously identified significant effects or would otherwise trigger a need for subsequent environmental review.

This document serves as the environmental documentation for the City's Circulation Element Update. This addendum to the Certified EIR demonstrates that the analysis in that EIR adequately addresses the potential physical impacts associated with the implementation of the proposed project and that the proposed project would not trigger any of the conditions described in CEQA Guidelines Section 15162 that call for further environmental review.

1.2 PROPOSED PROJECT

The Circulation Element is a comprehensive document that is meant to guide the development of the City's transportation system so that it can accommodate the needs of existing and planned land uses. The proposed project would make changes to the existing and proposed street network, which would also modify General Plan roadway classifications and roadway widths in certain areas within the City of Hesperia. The Circulation Element considers the flow of people and goods/services within the City, as well as to and from other communities in Southern California, including the broader Victorville Valley region.

The following summarizes the proposed changes to the Circulation Element:

- Incorporate the local truck routes previously identified by the City of Hesperia Engineering Department
- Relocate a future I-15 interchange from Muscatel St. to Cedar St.
- Reclassify Sultana from 7th Ave. to I Ave. as Second Arterial (formerly Arterial)
- Reclassify Sultana from I Ave. to Main St. as Second Arterial (formerly local road)
- Remove Mauna Loa extension from 3rd Ave. to Hesperia Rd. / Lemon St.
- Remove the previously planned bridge over the Mojave River at Lemon St.

1. Addendum to the Adopted General Plan EIR

The City's updated General Plan roadway network is estimated to generate fewer vehicle miles travelled (VMT) in 2050 compared to the existing General Plan Buildout roadway network (see Table 1, *Circulation Element VMT Calculations*).

Table 1 Circulation Element VMT Calculations

Scenario	Boundary VMT	Service Population	Boundary VMT/ Service Population
Circulation Element Update	9,009,637	211,334	42.6
Existing Circulation Element	8,592,343	193,083	44.5

Source: Fehr & Peers, 2025

- The following four goals replace the previously adopted goals and guide the expansion of the City's transportation system:
  - Goal 1: A roadway network that provides for the safe and efficient mobility needs of residents, businesses, visitors, and emergency services.
  - Goal 2: A circulation system that facilitates the movement of goods and services while minimizing impacts to sensitive land uses, such as homes, schools, and hospitals, and vulnerable roadway users, such as pedestrians and cyclists.
  - Goal 3: A comprehensive bicycle and pedestrian network that promotes physical activity and non-automotive travel within Hesperia for people of all ages and abilities.
  - Goal 4: A transit network that provides safe and convenient access to essential goods and services, job centers, and healthcare facilities.

Maintaining Level of Service D (LOS D) during non-peak hours remains a planning goal, but is no longer a mandate, giving the City flexibility in road design and application and complying with state law Public Resources Code 21099 (SB 743 (2013)). Reducing VMT is added as a goal reflecting the state guidance. The proposed project would revise the circulation element to refine the street network to accommodate land use changes, minimize VMT, and enhance transportation infrastructure, all in compliance with state law and aligned with the adopted General Plan framework.

1.3 CERTIFIED EIR

The Certified EIR determined that implementation of the existing General Plan would result in significant and unavoidable impacts related to air quality and traffic and circulation. These impacts are summarized below.

Air Quality

- **Consistency with the Air Quality Management Plan.** The 2010 Certified EIR concluded that the existing General Plan would not conflict with the 2004 Ozone Attainment Plan (OAP), because the 2010 update included minor incremental increase in population and employment growth compared to the previous general plan, and implementation of the goals and policies established within the existing General Plan would ensure that impacts generated by substantial population growth would be avoided or minimized.

- **Regional Air Quality Emissions.** The 2010 Certified EIR identified that construction and operation of individual projects under the existing General Plan may exceed the Mojave Desert Air Quality Management District (MDAQMD) thresholds and would cumulatively contribute to the Mojave Desert Air Basin's (MDAB) nonattainment designations, including ozone (O3). Implementation of Mitigation Measures AQ-1 through AQ-3 and the general plan policies would reduce impacts; however, impacts were identified as significant and unavoidable.

- **Localized Air Quality Emissions.** The 2010 Certified EIR identified that buildout of the existing General Plan did not produce the volume of traffic required to generate carbon monoxide (CO) hotspots, even at the most congested and highest volume traffic intersections. However, toxic air contaminants (TACs) were identified as a potential significant impact in the 2010 Certified EIR. Impacts were reduced to less than significant levels with Implementation of Mitigation Measures AQ-4 and AQ-5.[1]

- **Odors.** The 2010 Certified EIR found that the development under the existing General Plan could generate odors associated with the operation of construction vehicles, application of architectural coatings, cooking from restaurant uses, and trash receptacles from residences, in addition to other typical odor-generating land uses. The 2010 Certified EIR identified that impacts would be reduced to less than significant levels with implementation of Mitigation Measure AQ-6.

Traffic and Circulation

The 2010 Certified EIR indicated that impacts to the roadway plan, goods movement, transit, non-motorized/alternative transportation, and regional transportation would be minimized with the implementation of the General Plan goals and policies. The 2010 Certified EIR determined that impacts on roadways as a result of an increase in LOS would be significant and unavoidable even with the implementation of Mitigation Measure TIA-1, which requires a traffic study for individual projects as deemed necessary by the Development Services Director.

The purpose of PRC 21099 (SB 743(2013)) is to promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. Under SB 743, a project's effect on automobile delay shall not constitute a significant environmental impact under CEQA. Therefore, level of service (LOS) and similar vehicle delay or capacity metrics may no longer serve as transportation impact metrics for CEQA analysis. The California Office of Planning and Research updated the CEQA Guidelines and provided a final technical advisory (December 2018), which recommends VMT as the most appropriate measure of transportation impacts under CEQA. The California Natural Resources Agency certified and adopted the CEQA Guidelines, including the Guidelines section implementing SB 743. The changes were approved by the Office of the Administrative Law and are in effect.

[1] The 2010 Certified EIR also identified air quality impacts from siting sensitive uses proximate to major sources of air pollution that generate toxic air contaminants (TACs) and indoor air pollution. However, CEQA does not require analysis this type of analysis (California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369 (Case No. S213478)).

1.4 PURPOSE OF AN EIR ADDENDUM

According to CEQA Guidelines Section 15164(a), an addendum shall be prepared if some changes or additions to a previously adopted EIR are necessary, but none of the conditions enumerated in CEQA Guidelines Sections 15162(a)(1)– (3) calling for the preparation of a subsequent EIR have occurred. As stated in CEQA Guidelines Section 15162 (Subsequent EIRs and Negative Declarations):

Section 15162

When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or negative declaration was adopted, shows any of the following:

(a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(b) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(c) Mitigation Programs or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation Program or alternative; or

(d) Mitigation Programs or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation Program or alternative.

1.4.1 Rationale for Preparing an EIR Addendum

As stated in CEQA Guidelines Section 15164 (Addendum to an EIR):

(a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

(c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.

(d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.

(e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

The proposed project would include the Circulation Element Update with minor modifications to the existing and proposed street network. The VMT calculation indicates a reduction in VMT per service population. Due to the minor nature of the changes, an Addendum is recommended, rather than an IS/MND or new EIR, by CEQA Guidelines Section 15164. The project evaluates existing and proposed roadways from the adopted General Plan and its Certified EIR. The update will not trigger new significant impacts. Using an Addendum builds on prior work adopted by the City for the General Plan . As this Addendum is supported by substantial evidence, it provides the same protection as the original General Plan EIR if challenged.

A copy of this addendum, and all supporting documentation, may be reviewed or obtained at the City of Hesperia, Planning Department, 9700 Seventh Ave., Hesperia, CA 92345 Monday, Tuesday, Thursday 7:30 AM – 5:30 PM, Wednesday 9:00 AM – 5:30 PM, Friday 7:30 AM – 4:30 PM. The documents will also be made available on the Planning Department's website - https://www.hesperiaca.gov/409/Hesperia-General-Plan.

2. Modifications to Circulation Element

2.1 TRUCK ROUTES

Figure 1, *Truck Routes*, would be added to the Circulation Element (Exhibit CI-22).

In addition, the Circulation Element includes revised language regarding truck routes on page CI-49. Designated truck routes are as follows:

Bear Valley Road

- between Pacoima Road and the Mojave River

I Avenue

- between Bear Valley Road and Lemon Street

Eucalyptus Street

- between Santa Fe Avenue and I Avenue

Lemon Street

- between Santa Fe Avenue and I Avenue

Santa Fe Avenue

- between I Avenue and Lemon Street

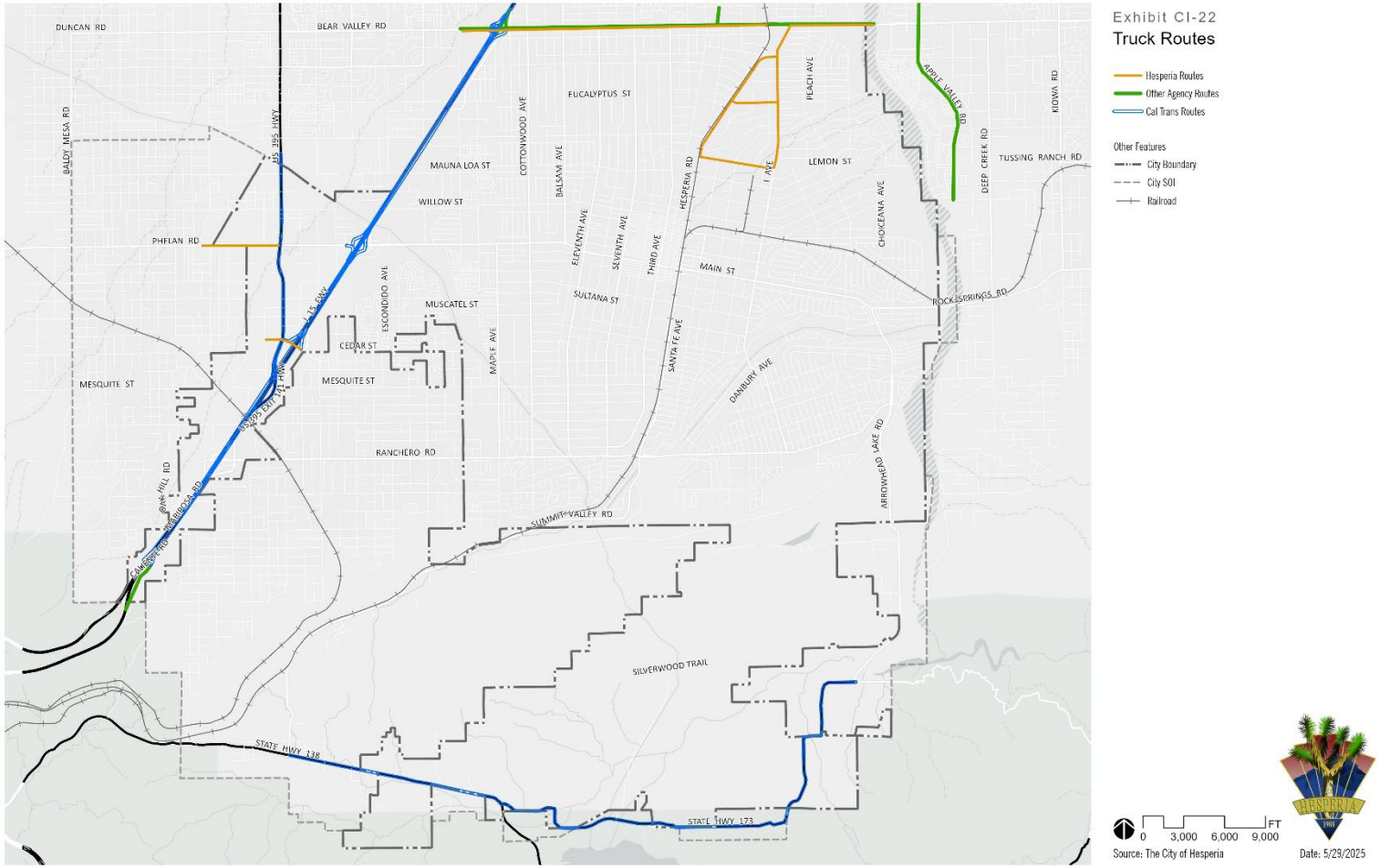
Phelan Road

- between Bellflower Street and U.S. Highway 395

Joshua Street

- between Caliente Road and Mariposa Road

Figure 1 Truck Routes



2. Modifications to Circulation Element

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2.2 TRANSPORTATION NETWORK

In addition, Figure 2, *Circulation Plan*, would replace the Circulation Element transportation network (Exhibit CI-1), as shown in Figure 3, *Existing Circulation Plan*. The proposed project would make the following changes to the transportation network map:

- Relocate future I-15 interchange from Muscatel St. to Cedar St.
- Reclassify Sultana from 7th Ave. to I Ave. as Second Arterial (formerly Arterial)
- Reclassify Sultana from I Ave. to Main St. as Second Arterial (formerly local road)
- Remove Mauna Loa extension from 3rd Ave. to Hesperia Rd. / Lemon St.
- Remove the previously planned bridge over the Mojave River at Lemon St.

2. Modifications to Circulation Element

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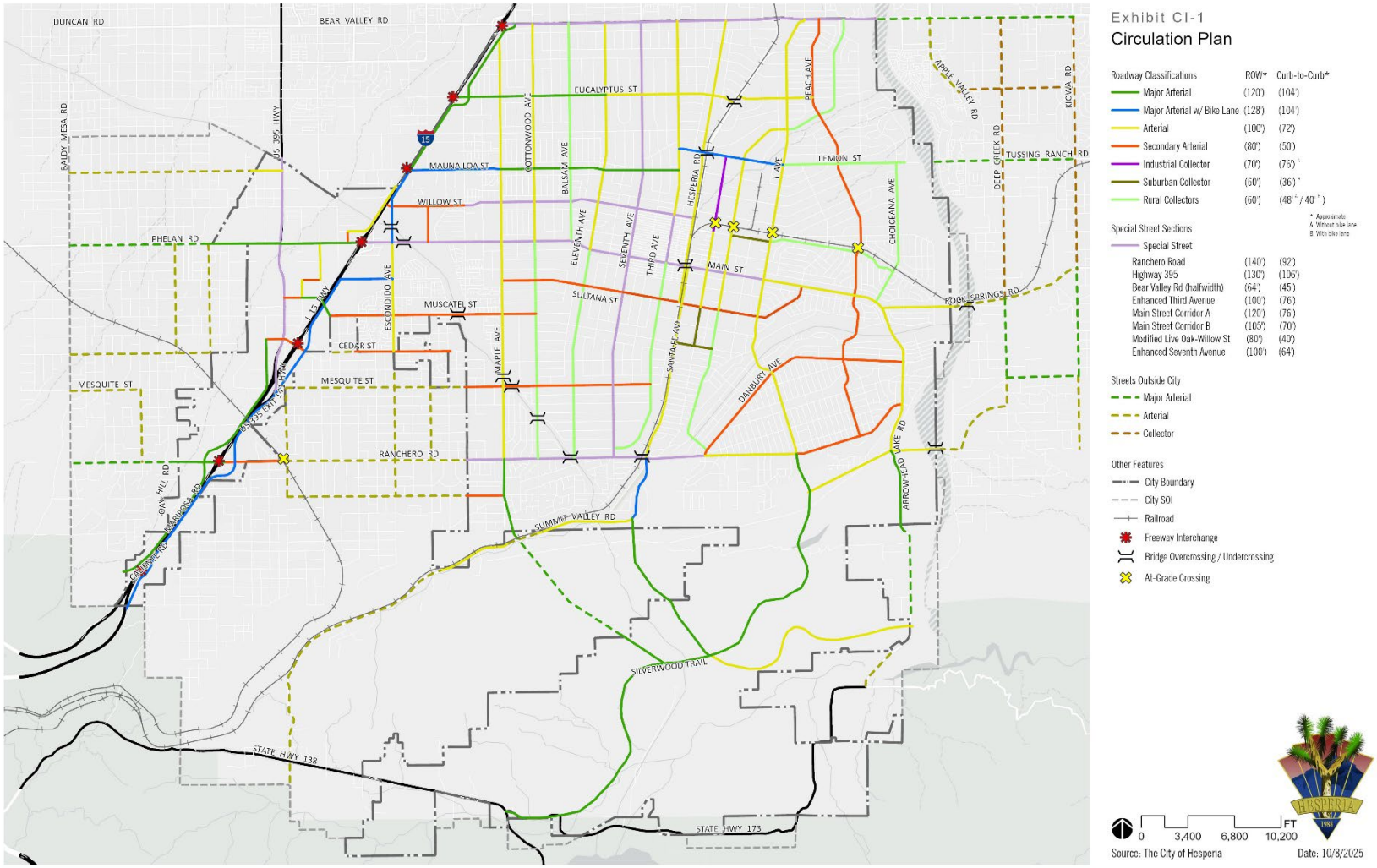
2. Modifications to Circulation Element

Figure 2 Circulation Plan



2. Modifications to Circulation Element

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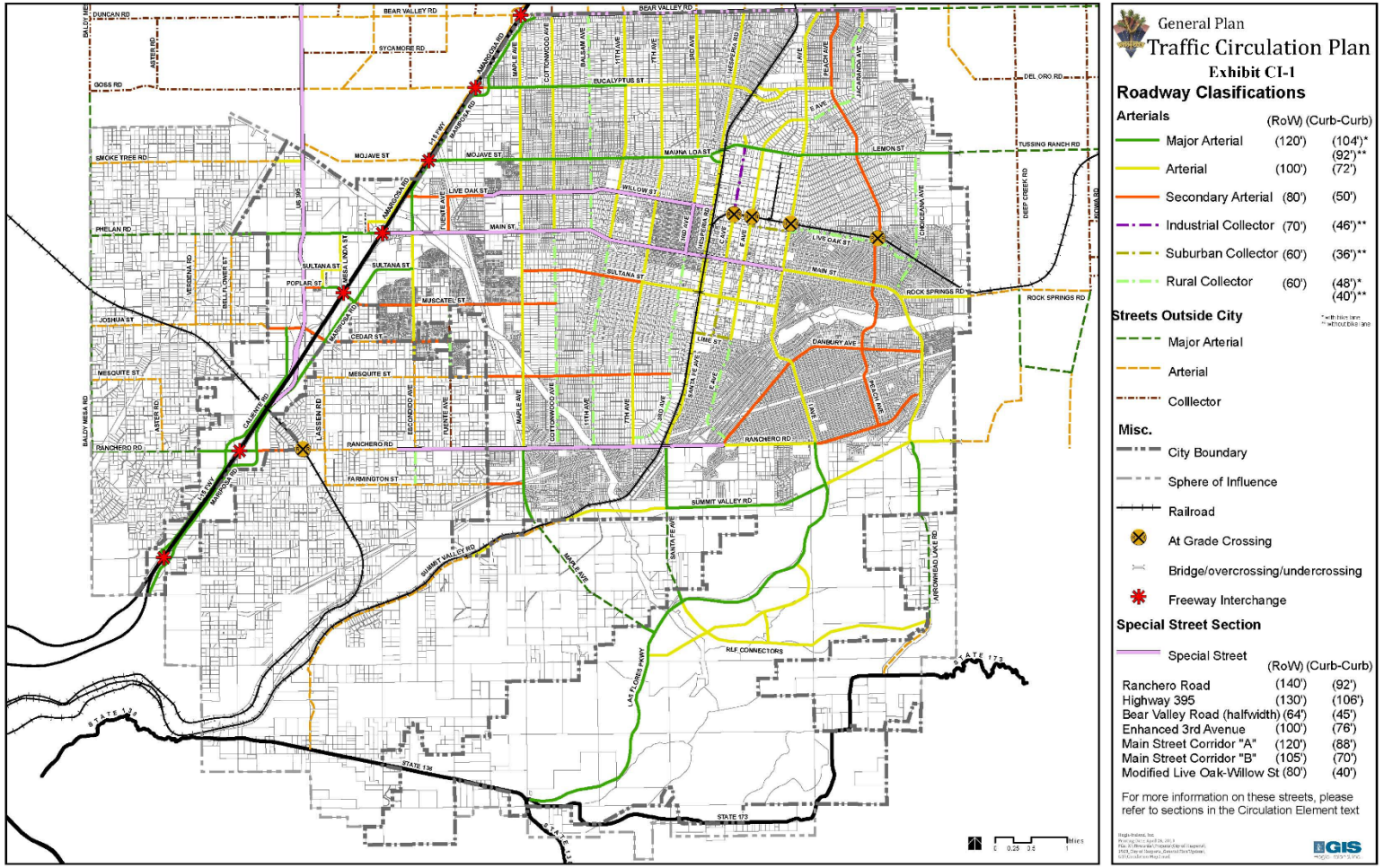
Figure 3 Existing Circulation Plan



2. Modifications to Circulation Element

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3. CEQA Analysis

3.1 ENVIRONMENTAL ANALYSIS

As shown in Figure 1, *Truck Routes*, the local truck routes are located within the Main Street Freeway Corridor Specific Plan (MSFCSP). This area is primarily characterized by industrial, commercial, institutional, and office, uses, with low density residential east of I Avenue. These local truck routes would not impact the surrounding environment as truck routes are not an unusual activity within the area due to the existing businesses that rely on trucks.

In addition, the air quality mitigation measures in the Certified EIR would help reduce impacts with the proposed changes, including setbacks and buffer zones between sensitive receptors. The proposed project will also introduce new circulation policies that would benefit residents, such as Policy CI-2.1., which aims to facilitate the efficient transport of goods while minimizing negative impacts on local circulation and noise-sensitive land uses. Therefore, the proposed truck routes are not anticipated to result in significant environmental or community health impacts based on existing conditions and land use.

3.2 FINDINGS

For the reasons explained in this addendum, the project would not cause any new significant environmental impacts or substantially increase the severity of significant environmental impacts disclosed in the Certified EIR. Thus, the proposed project does not trigger any of the conditions in CEQA Guidelines Section 15162, requiring the preparation of a subsequent EIR, and the appropriate environmental document as authorized by CEQA Guidelines Section 15164(b) is an addendum. The following identifies the standards set forth in Section 15162 of the CEQA Guidelines as they relate to the proposed project.

1. **No substantial changes are proposed in the project which would require major revisions of the EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.**

The local truck routes within the MSFCSP area (Figure 1) are not expected to significantly increase impacts, as they follow established arterials and collectors already utilized by trucks and would result in similar activities. Furthermore, the proposed project does not alter the existing land use pattern, as most future transportation improvements would occur on existing roads or through the construction of new road segments in undeveloped areas.

Additionally, no new significant environmental impacts have been identified beyond those already assessed in the General Plan EIR. As noted in Section 1.3, Certified EIR, significant and unavoidable impacts to air quality, land use, traffic, and circulation were previously determined. While the proposed project may result in physical impacts due to future transportation improvements, the analysis and mitigation measures from the General

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Plan EIR will still apply. For example, the air quality mitigation measures include setbacks and buffer zones between sensitive receptors (Mitigation Measure AQ-4). The proposed project will also introduce new circulation policies that would benefit residents, such as Policy CI-2.1, which aims to facilitate the efficient transport of goods while minimizing negative impacts on local circulation and noise-sensitive land uses. Despite these mitigation measures, the development of the General Plan will contribute to cumulative air quality impacts, both locally and regionally. The proposed project will not alter the air quality impact determinations made in the Certified EIR.

The Land use impacts would stay the same as the Certified EIR since the land use pattern is not changing under the proposed project. While the Certified EIR assessed transportation impacts based on Level of Service (LOS) metrics, state law now requires the analysis of transportation impacts based on Vehicle Miles Traveled (VMT) rather than LOS. As shown in Table 1, VMT under the proposed project is expected to be lower.

The City also evaluated impacts to roadway Level of Service (LOS) to ensure that the changes would not negatively impact circulation patterns. The analysis indicates that segment LOS under the proposed project remains consistent with segment LOS under the existing General Plan and does not create new, or exacerbate previously identified, deficiencies in the roadway network.

All other impacts and mitigation measures outlined in the Certified EIR will remain applicable. For instance, in the case of biological resources, the Certified EIR requires biological resource evaluations before development actions, including site-specific surveys for special-status species in identified habitat areas, particularly near linkage corridors and special survey areas (Mitigation Measure BR-1). As the revised circulation element will be part of the entire General Plan, all mitigation measures and policies in the remainder of the General Plan will apply.

Section 2, Modifications to Circulation Element, of this Addendum replaces existing figures and text in the Certified EIR to reflect the proposed project. These listed changes are not substantial changes that would necessitate major revisions of the Certified EIR. While the project involves physical impacts, it does not introduce new significant environmental effects or substantially increase the severity of previously identified impacts. The analysis and mitigation measures from the previously Certified EIR remain applicable to the proposed project.

2. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified shows:

a. The project will have one or more significant effects not discussed in the previous EIR.

In regard to transportation, VMT was used as the metric for greenhouse gas emissions. Emissions were determined by multiplying total vehicle miles traveled per day by emission factors, which account for exhaust emissions from starting, running, idling, and factors like tire and brake wear. The Certified EIR did not evaluate VMT since it was not required at the time, so the project team modeled VMT using the previously existing general plan's land plan buildout projections. As shown in Table 1, VMT under the proposed project is expected to be lower than the existing general plan.

The City also evaluated impacts to roadway Level of Service (LOS) to ensure that the changes would not negatively impact circulation patterns. The analysis indicates that segment LOS under the proposed project remains consistent with segment LOS under the existing General Plan and does not create new, or exacerbate previously identified, deficiencies in the roadway network.

b. Significant effects previously examined will be substantially more severe than shown in the previous EIR.

The Certified EIR identifies significant and unavoidable impacts to air quality, traffic, and circulation. While the proposed project may result in physical impacts from future transportation improvements, the analysis and mitigation measures from the General Plan EIR will still apply. For example, air quality mitigation measures include setbacks and buffer zones between sensitive receptors (Mitigation Measure AQ-4). Despite these mitigation measures, the development of the existing General Plan will still contribute to cumulative air quality impacts at both local and regional levels. The proposed project will not change the air quality impact conclusions from the Certified EIR, and land use impacts will remain the same since the land use pattern is not being altered. Although the Certified EIR assessed transportation impacts based on LOS, Senate Bill 743 now requires the analysis to focus on VMT. As shown in Table 1, VMT under the proposed project is expected to be lower. No significant effects previously examined will be substantially more severe than shown in the Certified EIR.

c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.

The mitigation measures outlined in the Certified EIR would remain applicable. For example, air quality mitigation measures include setbacks and buffer zones between sensitive receptors (Mitigation Measure AQ-4). In the case of biological resources, the Certified EIR requires biological resource evaluations before development actions, including site-specific surveys for special-status species in identified habitat areas, particularly near linkage corridors and special survey areas (Mitigation Measure BR-1). All other mitigation measures identified in the Certified EIR will continue to apply, ensuring that the proposed project addresses previously identified environmental impacts.

d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

There are no mitigation measures or alternatives significantly different from those analyzed in the General Plan EIR. Any potential mitigation or alternatives would not reduce the significant effects already identified in the Certified EIR. The proposed project is expected to have similar significant impacts to those outlined in the Certified EIR, and all associated policies and mitigation measures identified in the Certified EIR to address physical environmental effects will apply to future development, maintaining their mitigating effect. As noted earlier, the project primarily proposes refinements to align with the latest legal requirements and updates policies and best practices for circulation, without altering the underlying land uses or increasing environmental impacts compared to the existing General Plan. Since no new significant impacts are anticipated from the adoption of

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the Circulation Element Update, no additional mitigation measures or alternatives are required for the proposed project.

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