

# **Addendum to the City of Rancho Santa Margarita General Plan Final Environmental Impact Report for the Circulation Element Update**

**State Clearinghouse No. 2018041075**

March 2025

*Prepared for:*

City of Rancho Santa Margarita  
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Planning Division  
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**ADDENDUM TO THE  
CITY OF RANCHO SANTA MARGARITA GENERAL PLAN  
FINAL ENVIRONMENTAL IMPACT REPORT FOR THE  
CIRCULATION ELEMENT UPDATE**

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**LEAD AGENCY: CITY OF RANCHO SANTA MARGARITA**

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Circulation Element Update

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# 1 INTRODUCTION

## 1.1 PURPOSE AND BACKGROUND

The City Council adopted the City's first General Plan in 2002. On January 8, 2014, the City Council adopted a comprehensive update to the General Plan Circulation Element. In 2016, the City initiated a General Plan Update to modernize the Conservation/Open Space, Economic Development, Land Use, Noise, and Safety Elements to address the continued vision for the City, to ensure that all elements are consistent with new State requirements for General Plans, and to ensure that the City's goals and policies remain appropriate for the next 15 to 20 years. On March 11, 2020, the City Council certified the Rancho Santa Margarita General Plan Final EIR (State Clearinghouse Number [SCH] No. 2018041075) (General Plan FEIR) and adopted the updated Conservation/Open Space, Economic Development, Land Use, Noise and Safety Elements of the Rancho Santa Margarita General Plan. Subsequently, on February 9, 2022, in compliance with State Housing Element Law Government Code Sections 65580-65590.1, and to meet the requirements of California Government Code Section 65302(g), the City Council adopted the 2021-2029 Housing Element and an update to its General Plan Safety Element (Safety Element), which included adoption of the Addendum to the City of Rancho Santa Margarita General Plan Final Environmental Impact Report for the 2021-2029 Housing Element and Safety Element Update (2022 Addendum). Most recently, on August 28, 2024, to comply with Housing Element Programs 1, 2, 11, 14, and 15, the City Council adopted an amendment to the General Plan Land Use Element, inclusive of the Land Use Map, a text amendment to Rancho Santa Margarita Zoning Code (RSMZC), and an amendment to the Zoning Map, which included adoption of the Addendum to the City of Rancho Santa Margarita General Plan Final Environmental Impact Report for the Housing Element Implementation and Rezoning Project (2024 Addendum).

The City now proposes the 20242025 Circulation Element (referenced herein as "Project" or "Circulation Element Update"). The Project involves a comprehensive update to the Circulation Element. The Circulation Element Update includes minor changes/additions to reflect the current regulatory setting, including recently adopted amendments to the General Plan Land Use Element, Housing Element, and Safety Element, revisions to goals and policies to provide additional clarity and direction, address more current transportation modes, identify opportunities for new bikeways, and to better reflect the community's circulation needs. This includes the addition of a new goal and policies, minor changes to existing goal and policies, and minor updates to the City's Circulation Plan; refer to Section 2.

## 1.2 CEQA REQUIREMENTS

The City of Rancho Santa Margarita is the Lead Agency under the California Environmental Quality Act (CEQA) for the Circulation Element Update.

The purpose of this document is to analyze the potential differences between the impacts identified in the General Plan FEIR, as previously addended, and those that would potentially be associated with the proposed Project.

As part of its decision-making process, the City is required to review and consider whether the proposed Project would create new significant impacts or significant impacts that would be substantially more severe than those disclosed in the 2020 General Plan FEIR as previously addended. (Public Resource Code § 21166; CEQA Guidelines § 15162.) If major revisions to the 2020 General Plan FEIR are not necessary and none of the conditions described in State CEQA Guidelines Section 15162 calling for the preparation of additional CEQA documentation has occurred, the City may adopt an Addendum to the 2020 General Plan FEIR to document its findings that no subsequent or supplemental CEQA document is required. (CEQA Guidelines § 15164.)

Specifically, after approving a project and prior to approving further discretionary action for that project, depending upon the situation, the lead agency must generally: (1) prepare a Subsequent EIR; (2) prepare a Supplemental EIR; (3) prepare a Subsequent Negative Declaration; (4) prepare an Addendum to the EIR or Negative Declaration; or (5) prepare no further documentation. (See State CEQA Guidelines, §§ 15162 – 15164.) State CEQA Guidelines Section 15162 states:

When an EIR has been certified or a 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 the 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 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; or

(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.

Section 15164 of the State CEQA Guidelines explains when an Addendum to an EIR is appropriate. Per this section, where some changes or additions are necessary to the previously certified EIR, but none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR (as described above) have occurred, then the lead agency is directed to prepare an Addendum to the certified EIR (State CEQA Guidelines, § 15164). Further, the Addendum should include a “brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162,” and that “explanation must be supported by substantial evidence” (State CEQA Guidelines, § 15164 [e]). The Addendum need not be circulated for public review but may simply be attached to the certified EIR (State CEQA Guidelines, § 15164 [c]).

### **1.3 INCORPORATION BY REFERENCE**

The documents outlined below, which were utilized during preparation of this Addendum and are a matter of public record, are hereby incorporated by reference.

#### **Rancho Santa Margarita General Plan**

The City Council adopted the 2020 Update to the City of Rancho Santa Margarita General Plan on March 11, 2020. The General Plan is a comprehensive legal document that sets forth the City's long-range planning policies and serves as the guiding document for achieving the community's vision for the future. The General Plan identifies issues, goals, and policies to guide land use and development, and is organized into seven mandatory and optional “elements” in accordance with California Government Code Section 65302: Circulation, Conservation/Open Space, Economic Development, Housing, Land Use, Noise, and Safety. The 2020 Update included updates to the Conservation/Open Space, Economic Development, Land Use, Noise, and Safety Elements.

Land Use Element Table LU-3 in the 2020 General Plan presents the projected future development intensity and density based upon existing and historical development as well as anticipated development associated with the future land use opportunities described in the Land Use Element. Land Use Element Table LU-4 summarizes the net growth above existing conditions anticipated by the 2020 General Plan Update. Based upon assumed development intensities and densities identified in Table LU-3, a total of 18,294 dwelling units and approximately 9.1 million square feet of non-residential land uses, representing 528 additional dwelling units and 3,085,014 additional square feet of non-residential uses beyond 2020 existing conditions were anticipated by 2040.

All cities and counties in California are required to adopt a Housing Element and to update it at least every eight years. In 2022, the City adopted the 2021-2029 Housing Element and Safety Element Update. The 2021-2029 Housing Element was required to include an inventory of land suitable and available for residential development to meet the City's regional housing need allocation (RHNA) of 680 units by income level. Implementation of the 2021-2029 Housing Element would accommodate 182 more residential units and up to 1,091,985 fewer square feet of non-residential uses than the 2020 General Plan development assumptions (refer to the Rancho Santa Margarita General Plan Final EIR discussion below).

Updates to the Safety Element were also completed to meet the requirements of California Government Code Section 65302(g) (Section 65302) as updated by Senate Bills 1241, 379, 99, and 1035, and to incorporate the Rancho Santa Margarita Local Hazard Mitigation Plan by reference (pursuant to SB 379).

In 2024, the Land Use Element was amended to implement Housing Element Programs 1 and 14, provide overall internal consistency with the 2021-2029 Housing Element, provide updated existing and estimated development conditions, and provide minor text updates and revisions for clarification and accuracy purposes, such as corrected references to the Rancho Santa Margarita Zoning Code (RSMZC). The Land Use Map (Land Use Element Figure LU-1) was amended to change the land use designation on 12 sites, identified in the 2021-2029 Housing Element, with 10 sites changed from General Commercial to Mixed-Use and two sites changed from Business Park to Mixed-Use.

## **Rancho Santa Margarita General Plan Final EIR**

The City Council certified the General Plan FEIR on March 11, 2020. The 2020 General Plan FEIR provided a description of potential environmental impacts of the 2020 General Plan Update and identified mitigation measures to avoid or reduce impacts to a less than significant level where feasible. The 2020 General Plan FEIR's analysis was based on the change between development under existing conditions and reasonably anticipated development identified in the 2020 General Plan Land Use Element (Land Use Element Table LU-3 and 2020 General Plan FEIR Table 3-3). The 2020 General Plan FEIR analyzed the environmental impacts resulting from anticipated growth of 528 additional dwelling units and 3,085,014 additional square feet of non-residential uses based upon the assumed development intensities and densities identified in the Land Use Element.

For each environmental issue addressed in 2020 General Plan FEIR Section 5.0, Approach to Environmental Analysis, the assumptions for the project impact analyses were explained. The analyses were based on the project conditions that would result in the greatest impact for each environmental issue to ensure a "reasonable worst-case" evaluation of potential environmental impacts based on historical development patterns in the City. For instance, the 2020 General Plan Update's reasonably projected development capacity (i.e., 528 additional dwelling units and 3,085,014 additional square feet of non-residential uses by 2040) was assumed for traffic and other issue areas, although development ultimately may not actually occur at these levels of assumed

growth. The analysis of potential project impacts was based upon various assumptions regarding existing and future conditions in Rancho Santa Margarita, including historical development patterns, limited number of parcels being developed at the maximum density or intensity, and reasonably anticipated development.

The 2020 General Plan FEIR concluded that based on the General Plan growth assumptions, projected future development would result in less than significant impacts or less than significant impacts with the implementation of mitigation measures for all issue areas analyzed except for Air Quality (Violate Any Air Quality Standard or Contribute Substantially to an Existing or Projected Air Quality Violation) and Greenhouse Gas Emissions (Generation of GHG Emissions), which were determined to be significant and unavoidable.

### **Addendum to the Rancho Santa Margarita General Plan Final EIR**

The City has since adopted two addenda to the General Plan FEIR: 2022 Addendum to the City of Rancho Santa Margarita General Plan Final Environmental Impact Report for the 2021-2029 Housing Element and Safety Element Update (2022 Addendum); and 2024 Addendum to the City of Rancho Santa Margarita General Plan Final Environmental Impact Report for the Housing Element Implementation and Rezoning Project (2024 Addendum). The 2022 Addendum and 2024 Addendum are incorporated here by reference.

**2022 Addendum.** The 2021-2029 Housing Element identified 15 sites in order to accommodate the City's remaining RHNA (640 units<sup>1</sup>) and introduced two new mechanisms to allow for residential development, to be created subsequent to Housing Element adoption. These mechanisms include a "Workforce Housing Overlay" to be applied to three sites within the Business Park district, totaling 38.43 acres and a "Mixed-Use" land use and zoning designation to be applied to 12 sites (13 parcels) in the City's central core, totaling 26.62 acres. The RHNA includes 40 ADUs, the potential for 344 units resulting from implementation of the Workforce Housing Overlay on the three sites, and the potential of 326 units on 12 sites resulting from implementation of the Mixed-Use designation/zone, that could result in 710 additional dwelling units overall, or 182 more dwelling units than analyzed in the 2020 General Plan FEIR. The 2022 Addendum evaluated the potential environmental impacts of the 182 additional dwelling units and associated reduction in non-residential development capacity of 1,091,985 square feet that could occur under implementation of the 2021-2029 Housing Element.

**2024 Addendum.** The adopted 2021-2029 Housing Element identified several programs, including Program 1 (RHNA/Shortfall), Program 2 (Adequate Sites Monitoring), Program 11 (Density Bonus), Program 14 (Zoning Code and General Plan Amendments), and Program 15 (Development Review Procedures). Program 1 committed the City to amend the RSMZC to establish the Workforce Housing Overlay and amend the General Plan Land Use Element and RSMZC to establish the Mixed-Use land use designation and zoning district, and to amend the zoning map

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<sup>1</sup> The 640 remaining units are a result of the City's total RHNA of 680 units less 40 ADUs.

to zone adequate candidate sites to meet its RHNA. Program 2 committed the City to formalize procedures to evaluate capacity and ensure adequate capacity is available for the remaining RHNA. Program 11 committed the City to implement density bonuses consistent with State law. Program 14 committed the City to adopt amendments to the RSMZC and General Plan to address recent changes to State law and create consistency with the 2021-2029 Housing Element. Program 15 committed the City to develop procedures to address streamlining requirements of Senate Bill (SB) 35 and objective development standard requirements of SB 330.

To comply with Housing Element Programs 1, 2, 11, 14, and 15, an amendment to the General Plan Land Use Element, inclusive of the Land Use Map (Figure LU-1), a text amendment to RSMZC, and an amendment to the Zoning Map were proposed. The 2024 Addendum evaluated the potential environmental impacts that could occur under implementation of these proposed amendments. The proposed amendments did not provide for any changes in the development potential beyond the change in development potential evaluated in the 2022 Addendum.

The phrase “General Plan FEIR” throughout this document means the General Plan FEIR as previously addended.

### **Rancho Santa Margarita Municipal Code (RSMMC)**

The Rancho Santa Margarita Municipal Code (RSMMC) consists of all the ordinances of the City of Rancho Santa Margarita. The RSMMC is one of the City's primary tools to control land uses, in accordance with the General Plan programs and policies. The City's Zoning Ordinance, included in RSMMC Title 9, Planning and Zoning, is an implementing tool to: 1) achieve the goals and policies established in the General Plan; 2) serve the public health, safety, and general welfare of the City of Rancho Santa Margarita; and 3) provide the economic and social advantages resulting from an orderly planned use of land and resources. RSMMC Title 10, Buildings and Construction, adopts the 2022 California Building Standards Code, with amendments in consideration of the City's local climactic, geological, and topographical considerations. Other relevant RSMMC regulations include the following, among others: Title 5, Health and Sanitation; Title 7, Recreation, Parks and Facilities; and Title 11, Streets and Sidewalks.

## 2 DESCRIPTION OF THE PROPOSED PROJECT

### 2.1 PROJECT LOCATION AND SETTING

The City of Rancho Santa Margarita is located in eastern Orange County about 10 miles northeast of the Pacific Ocean, in the foothills of the Santa Ana Mountains. The community is bisected by the Foothill Transportation Corridor State Route 241 (SR-241), which extends to the north connecting with North County cities such as Yorba Linda and Anaheim, and to the south terminating at Oso Parkway. The cities of Mission Viejo and Lake Forest are located to the west, Cleveland National Forest is located to the east, and unincorporated Orange County is located to the north and south. Regional access to the City is provided via SR-241, SR-133, and Interstate 5; refer to Figure 1, Regional Location Map. The General Plan Study Area for Rancho Santa Margarita is comprised of 8,607 acres (13 square miles), of which 8,280 acres are located within the City's incorporated limits and 327 acres are located within the City's Sphere of Influence (SOI); refer to Figure 2, General Plan Study Area.

### 2.2 PROJECT CHARACTERISTICS

In compliance with State law, the City of Rancho Santa Margarita has prepared an update to its Circulation Element to reflect the current regulatory setting, including recently adopted amendments to the General Plan Land Use Element, Housing Element, and Safety Element; revise goals and policies to provide additional clarity and direction; address more current transportation modes, identify opportunities for new bikeways; and to better reflect the community's circulation needs. The Circulation Element addresses these topical areas with goals and policies to provide and foster a balanced, multi-modal network for all roadway users.

#### **Circulation Element Organization**

Similar to the existing Circulation Element adopted in 2014, the proposed Circulation Element Update includes an introduction to the Element, the Element's issues, goals, and policies, and the Circulation Plan. The Introduction provides an overview of the Circulation Element. The Issues, Goals, and Policies section identifies issues pertaining to circulation and transportation that could potentially affect the City and establishes related goals and policies. These goals are overall statements of the City's desires and consist of broad statements of purpose and direction pertaining to the community's circulation. The policies serve as guidelines for creating a balanced multi-modal transportation network. The Circulation Plan section explains how the circulation issues are addressed within the community and how the goals and policies will be achieved and implemented.



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Figure 1. Regional Location Map

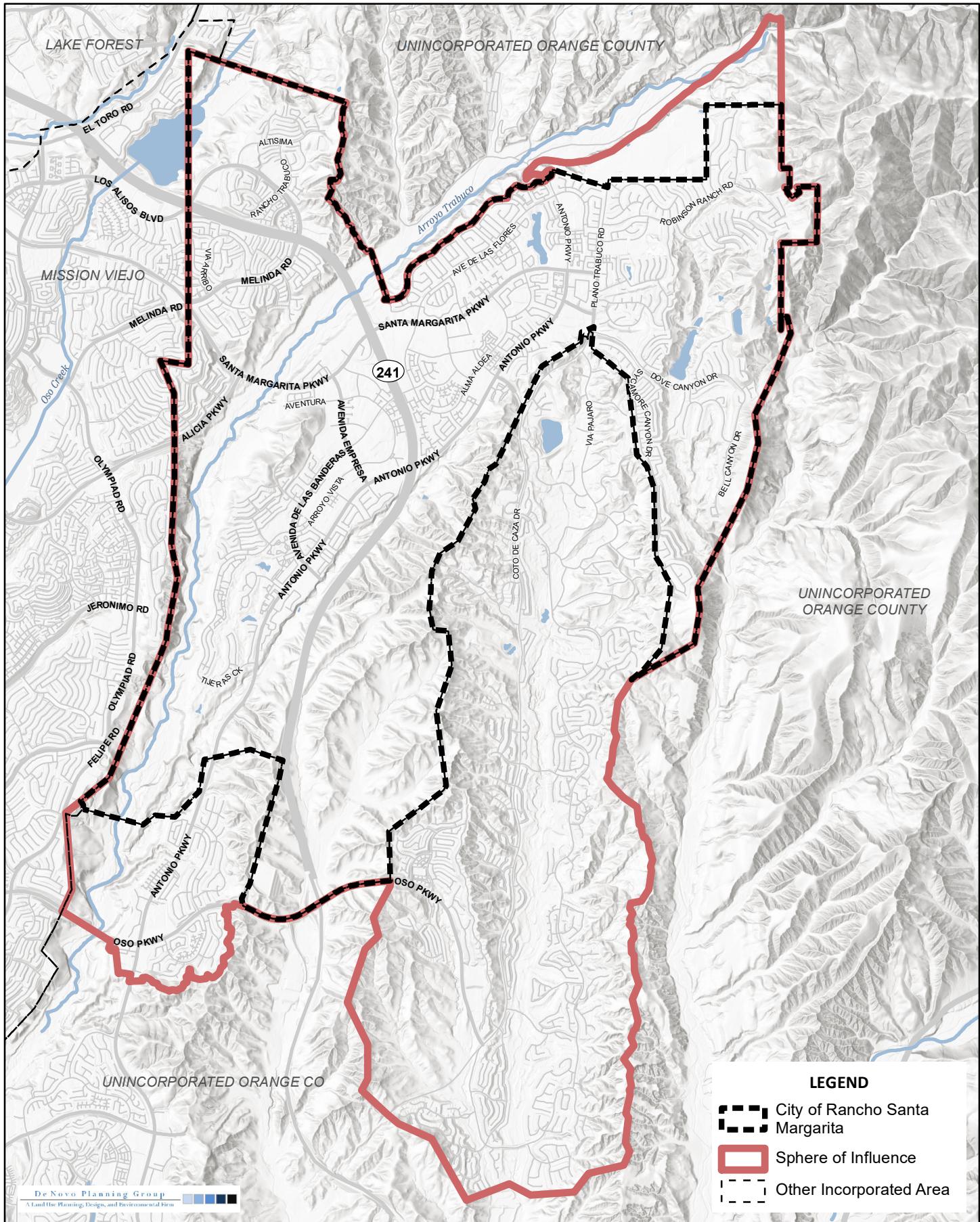


Figure 2. General Plan Study Area

Sources: Orange County GIS; USGS; LAFCO. Map date: November 16, 2021.

0 1 Miles

## **Summary of Circulation Element Modifications**

The proposed Circulation Element Update includes minor revisions to language, tables, and figures to update existing conditions and to better reflect the community's circulation needs relative to more recent updates to the Land Use and Housing Elements. It also includes modifications to existing goals and policies, and the addition of a new goal and related policies, as described further below. The changes proposed continue to emphasize providing a safe and efficient circulation system with greater emphasis on providing a circulation system that supports multi-modal transportation. The following summarizes the modifications to the 2025 Circulation Element, as compared to the existing (2014) Circulation Element. A summary matrix is provided at the end of this section providing a section-by-section comparison of the existing (2014) Circulation Element and the proposed 2025 Circulation Element.

### **Introduction**

Minor changes/additions have been made to the Introduction section to reflect the current regulatory setting. Relevant regulations that have been updated since adoption of the existing (2014) Circulation Element include:

- Senate Bill (SB) 743, which went into effect on July 1, 2020, changed transportation impact analysis as part of CEQA compliance, replacing the determination of impacts based on roadway and intersection operating conditions with vehicle miles traveled (VMT). As discussed further below, the City's Transportation Study Guidelines provide guidance on how to prepare transportation studies in the City in compliance with SB 743.
- Assembly Bill (AB) 747, which went into effect January 1, 2022, requires cities to evaluate route capacity, safety, and viability under a range of emergency scenarios. The Circulation Element Update integrates policies related to evacuation routes from the Safety Element to comply with AB 747.
- SB 99, which went into effect January 1, 2022, requires cities to identify residential developments in hazard areas that do not have at least two emergency evacuation routes. The City's General Plan Safety Element was updated in 2022 to meet the requirements of SB 99.
- AB 1409, which went into effect January 1, 2022, requires cities to identify evacuation locations by policies in the Circulation Element, and the existing network. The Circulation Element Update integrates policies related to evacuation routes from the Safety Element to comply with AB 1409.
- The Southern California Association of Governments (SCAG) Regional Council adopted Connect SoCal 2024 (2024 - 2050 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]) on April 4, 2024. Connect SoCal 2024 is a long-range visioning document that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern in Southern California. Connect SoCal 2024 identifies Priority Development Areas (PDAs), which are areas within the SCAG region where future growth can be located to help the region reach mobility and environmental goals. PDAs include

Transit Priority Areas, Neighborhood Mobility Areas (NMAs), Livable Corridors and Spheres of Influence. NMAs focus on creating, improving, restoring, and enhancing safe and convenient connections to schools, shopping, services, places of worship, parks, greenways, and other destinations. The Circulation Element Update includes a new Figure (Circulation Element Figure CIR-1) to show the portion of Rancho Santa Margarita designated as an NMA.

Further, minor textual changes have occurred to update the description of the Circulation Element's relationship to other General Plan Elements.

### **Issues, Goals, and Policies**

Proposed modifications to existing goals and policies provide additional clarity and direction and better reflect the community's circulation needs. Additionally, the Circulation Element Update includes several new policies, as well as a new goal. Notably, the Circulation Element Update adds a new Complete Streets goal (Goal 3) and policies to promote a safe and accessible circulation system that accommodates all user types.

Goal 3: Provide a safe and convenient transportation network accessible for all transportation modes and users.

- Policy 3.1: Apply Complete Streets principles to transportation improvements on City facilities to serve all types of travel (Circulation Element Figure CIR-3 displays the existing roadway functional classifications).
- Policy 3.2: Identify and address gaps in networks serving vehicles, bicyclists, pedestrians, transit users, and other users.
- Policy 3.3: Seek grants to establish a Safe Routes to School Program, encouraging parents and children to walk or bike to school.
- Policy 3.4: Consider the land use and design context of the surrounding areas when designing Complete Streets.
- Policy 3.5: Monitor and evaluate the development of new mobility technologies and the potential impacts on designing a transportation network that accommodates all modes and users.
- Policy 3.6: Plan for emerging autonomous vehicles and transportation network companies (TNCs) by designing spaces to allow for safe pick-up and drop-off.

New proposed policies include:

- Policy 1.6: Require new development projects to prepare transportation studies consistent with the City's Transportation Study Guidelines, implement appropriate measures to mitigate CEQA impacts and address non-CEQA effects to the transportation network.
- Policy 1.7: Require new development projects to accommodate vehicles (including emergency vehicles), pedestrians, and bicycles through the dedication of land for public improvements such as roadways, wider sidewalks and/or bicycle lanes, as appropriate and warranted by the project.

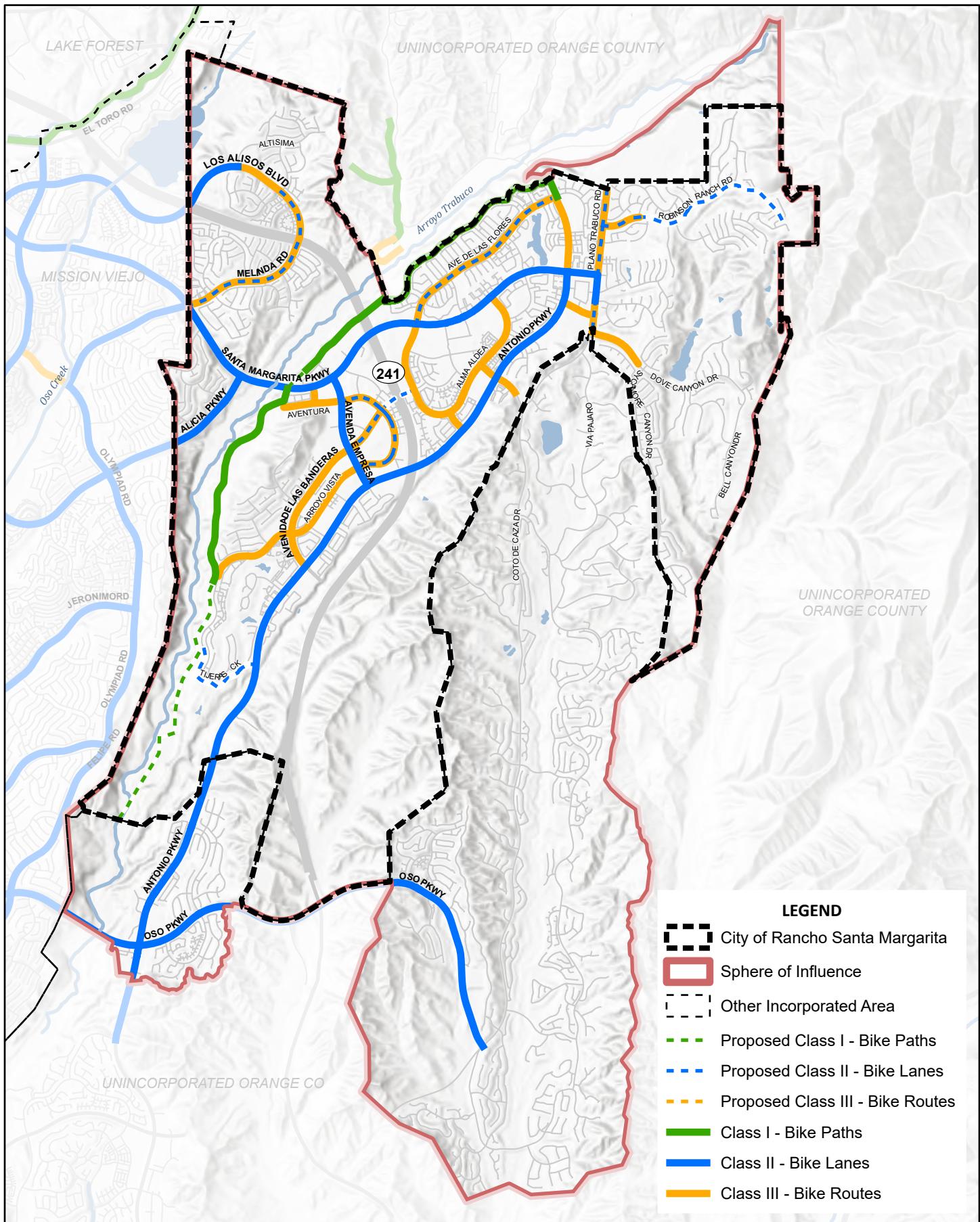
- Policy 1.8: Coordinate with public school districts and private schools to minimize queueing and parking impacts on public streets and in residential areas.
- Policy 1.9: Incorporate necessary improvements and maintenance to evacuation routes consistent with the Safety Element, and according to applicable requirements identified in regional and local plans.
- Policy 2.3: Work with regional partners to plan for emerging transportation modes and technologies.
- Policy 4.1: Support roadway design principles that create a safe, pleasant, and comfortable experience for bicyclists and pedestrians.
- Policy 4.3: Design land development projects to provide safe and attractive bicycle and pedestrian facilities, such as secure bicycle parking, pedestrian-scale lighting, and landscaping.
- Policy 4.4: Require new developments to make improvements to provide connectivity and accessibility to a mix of uses such as schools, parks, work, and shopping destinations that meet residents' daily needs.
- Policy 4.5: Seek funding for projects to implement bikeway facilities recommended in regional plans.
- Policy 4.6: Promote the installation of pedestrian and bicycle amenities in appropriate locations, in order to enhance non-automobile forms of transportation.
- Policy 4.8 Plan for emerging travel modes such as e-bikes, considering applicable regulations, infrastructure, education and enforcement needs to promote safety, accessibility and enjoyment for all users within the City.
- Policy 5.5: Encourage the development of Transportation Demand Management plans for all developments or facility expansions pursuant to the City's Transportation Study Guidelines, to encourage ride-sharing and other improvements, thereby reducing vehicle trips.

### **Circulation Plan**

Minor changes/additions to the Circulation Plan are proposed to reflect the current regulatory setting, including recently adopted amendments to the General Plan Land Use Element, Housing Element, and Safety Element. Goals and policies have been revised to provide additional clarity and direction, and to better reflect the community's circulation needs. The updated Circulation Plan was developed in accordance with implementation of the City's General Plan based on the development capacity identified in Table LU-3 of the 2024 General Plan Land Use Element, including the sites identified as suitable for housing development in the 2021-2029 Housing Element. However, no changes have been made to the roadway functional classifications comprising the City's local circulation system. That is, no new roadways, elimination of roadways, or changes in roadway capacities are proposed as part of the Circulation Element Update. Revisions to the Circulation Plan generally include an expanded discussion of new modes of travel, the local bicycle and pedestrian network, and regional public transportation system. For example, the updated Circulation Plan adds a section on e-bikes, complete streets, and includes proposed bicycle facilities alongside the City's existing bicycle network; refer to Figure 3, Existing and

Proposed Bikeway Facilities. The proposed bicycle facilities would not result in modifications to the existing roadway classification system.

The updated Circulation Plan also incorporates a discussion on the City's Transportation Study Guidelines, which have been established to detail the requirements for conducting the VMT analysis portion of the CEQA transportation impact analysis and for conducting Level of Service (LOS) analysis, site access assessments, and other transportation analyses for non-CEQA purposes. The Transportation Study Guidelines guide the preparation of transportation studies that are normally required as part of the application review and processing of land development projects.



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**Figure 3. Existing and Proposed Bikeway Facilities**

Sources: Kittelson & Associates; Orange County GIS; USGS; LAFCO. Map date: February 7, 2025.

Existing (2014) Circulation Element	Proposed 2025 Circulation Element Update	Summary of Changes
<b>Introduction</b> <ul style="list-style-type: none"> <li>Introductory paragraphs describe the City's circulation system and contents of the Element</li> </ul>	<b>Introduction</b> <ul style="list-style-type: none"> <li>Introductory paragraph outlining the City's overall goals for the circulation system</li> </ul>	Minor text changes to provide clarity and better reflect the community's circulation needs.
<i>Purpose of the Circulation Element</i> <ul style="list-style-type: none"> <li>Purpose and brief overview of the Element, including State planning law requirements</li> </ul>	<i>Purpose of the Circulation Element</i> <ul style="list-style-type: none"> <li>Purpose of Element and overview of topical areas covered</li> </ul>	Minor text changes to provide clarity and better reflect the community's circulation needs.
<i>Scope and Content of the Circulation Element</i> <ul style="list-style-type: none"> <li>Scope and content of the Circulation Element; Principles the Circulation Element focuses on; and how to read goals, policies, and actions</li> </ul>	<i>Scope and Content of the Circulation Element</i> <ul style="list-style-type: none"> <li>Description of State planning law requirements; Scope and content of the Circulation Element; and how to read goals, policies, and actions</li> </ul>	Minor text changes to provide clarity and better reflect the community's circulation needs.
<i>Related Plans and Programs</i> <ul style="list-style-type: none"> <li>Description of regulatory setting, including: <ul style="list-style-type: none"> <li>California Assembly Bill 32 (2006) and Senate Bill 375 (2008)</li> <li>AB 1358 California Complete Streets Act of 2008</li> <li>The Regional Transportation Plan (RTP)</li> <li>Orange County Congestion Management Program (CMP)</li> </ul> </li> </ul>	<i>Related Plans and Programs</i> <ul style="list-style-type: none"> <li>Description of regulatory setting, including: <ul style="list-style-type: none"> <li>California Assembly Bill (AB) 32 (2006)</li> <li>California Senate Bill (SB) 32 (2016)</li> <li>SB 375 (2008)</li> <li>SB 743 (2013)</li> <li>AB 1358 California Complete Streets Act (2008)</li> </ul> </li> </ul>	Includes relevant regulations that have been updated since adoption of the Existing (2014) Circulation Element, including: <ul style="list-style-type: none"> <li>Senate Bill (SB) 743, which went into effect on July 1, 2020, changed transportation impact analysis as part of CEQA compliance, replacing the determination of impacts based on roadway and intersection operating conditions to vehicle miles traveled (VMT).</li> </ul>

Existing (2014) Circulation Element	Proposed 2025 Circulation Element Update	Summary of Changes
<ul style="list-style-type: none"> <li>○ Orange County Master Plan of Arterial Highways</li> <li>○ OCTA Commuter Bikeways Strategic Plan</li> <li>○ Orange County Sustainable Communities Strategy (SCS)</li> </ul>	<ul style="list-style-type: none"> <li>○ Office of Planning and Research (OPR), California Government Code Section 65302(b)</li> <li>○ AB 747 (2022)</li> <li>○ SB 99 (2022)</li> <li>○ AB 1409 (2022)</li> <li>○ Southern California Association of Governments (SCAG)'s Connect SoCal (2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy)</li> <li>○ Orange County Transportation Authority (OCTA) Congestion Management Program (CMP)</li> <li>○ OCTA Master Plan of Arterial Highways (MPAH)</li> <li>○ OCTA Long Range Transportation Plan (LRTP)</li> </ul>	<ul style="list-style-type: none"> <li>● Assembly Bill (AB) 747, which went into effect January 1, 2022, requires cities to evaluate route capacity, safety, and viability under a range of emergency scenarios.</li> <li>● SB 99, which went into effect January 1, 2022, requires cities to identify residential developments in hazard areas that do not have at least two emergency evacuation routes. The Safety Element was updated/adopted in 2022 to address SB 99.</li> <li>● AB 1409, which went into effect January 1, 2022, requires cities to identify evacuation locations by policies in the Circulation Element, and the existing network.</li> <li>● The Southern California Association of Governments (SCAG) Regional Council adopted Connect SoCal 2024 (2024 – 2050 Regional Transportation Plan/Sustainable</li> </ul>

Existing (2014) Circulation Element	Proposed 2025 Circulation Element Update	Summary of Changes
		<p>Communities Strategy [RTP/SCS]) on April 4, 2024.</p> <ul style="list-style-type: none"> <li>○ Connect SoCal 2024 is a long-range visioning document which identifies Priority Development Areas (PDAs), and Neighborhood Mobility Areas (NMAs) within the SCAG region where future growth would help the region reach mobility and environmental goals. PDAs include transit.</li> <li>○ New Figure (Figure CIR-1) identifies the NMA in Rancho Santa Margarita.</li> </ul>
<p><i>Relationship to Other General Plan Elements</i></p> <ul style="list-style-type: none"> <li>• Describes how other General Plan Elements are consistent with and complementary to the Circulation Element</li> </ul>	<p><i>Relationship to Other General Plan Elements</i></p> <ul style="list-style-type: none"> <li>• Describes how other General Plan Elements are consistent with and complementary to the Circulation Element</li> </ul>	<p>Minor text changes to describe updates made to other General Plan Elements since adoption of the 2014 Circulation Element.</p>
<p><b>Issues, Goals, and Policies</b></p> <ul style="list-style-type: none"> <li>• Introduces goals and policies</li> </ul>	<p><b>Issues, Goals, and Policies</b></p> <ul style="list-style-type: none"> <li>• Introduces goals and policies</li> </ul>	<p>Minor text changes to provide clarity and better reflect the community's</p>

Existing (2014) Circulation Element	Proposed 2025 Circulation Element Update	Summary of Changes
Local Circulation System (Goal 1)	Local Circulation System (Goal 1)	<p>circulation needs, including to reflect updated goals.</p> <p>Text changes to Goal 1 and related policies. Addition of four new policies.</p> <ul style="list-style-type: none"> <li>Text change to Goal 1: Added emphasis on safety and the need to move people and goods while reducing emphasis on traffic and congestion.</li> <li>Text change to Policy 1.1: Simplified the introduction and explained the range of users.</li> <li>Text change to Policy 1.2: Added emphasis on maintaining sufficient LOS consistent with performance standards and the Transportation Study Guidelines.</li> <li>Text change to Policy 1.3: Specified the type of transportation improvement programs.</li> <li>Text change to Policy 1.4: minor changes, related to word choice.</li> <li>Text change to Policy 1.5: Specified the type of traffic management approaches.</li> </ul>

Existing (2014) Circulation Element	Proposed 2025 Circulation Element Update	Summary of Changes
		<ul style="list-style-type: none"> <li>• Addition of Policy 1.6: New policy to reflect implementation of Transportation Study Guidelines and new requirements.</li> <li>• Addition of Policy 1.7: New policy to require dedication of land for public improvements to accommodate transportation needs.</li> <li>• Addition of Policy 1.8: New policy to help improve school safety.</li> <li>• Addition of Policy 1.9: New policy to facilitate future evacuation planning – incorporate improvements and maintenance to evacuation routes consistent with the Safety Element and consistent with local and regional plans.</li> </ul>
Regional Circulation System (Goal 2)	Regional Circulation System (Goal 2)	Text changes to Goal 2 and related policies. Addition of one new policy. <ul style="list-style-type: none"> <li>• Text change to Goal 2: Removed mention of economic well-being of the community, as this goal addresses overall</li> </ul>

Existing (2014) Circulation Element	Proposed 2025 Circulation Element Update	Summary of Changes
		<p>regional movements, not just economic development.</p> <ul style="list-style-type: none"> <li>Text change to Policy 2.1: Added specific agencies and groups for coordination.</li> <li>Text change to Policy 2.3 (renumbered as Policy 2.5): Focused policy on coordination and review, instead of details on potential new facilities.</li> <li>Text change to Policy 2.4: Made policy more succinct by removing mention of specific issues to reduce.</li> <li>Addition of new Policy 2.3: New policy to ensure coordination with regional partners to plan for emerging transportation modes and technologies.</li> </ul>
Public Transportation System (Goal 3)	Complete Streets (Goal 3)	<p>Addition of new goal and six related policies related to Complete Streets.</p> <ul style="list-style-type: none"> <li>Addition of Goal 3: Added new Complete Streets goal to promote and encourage all user types.</li> <li>Addition of Policy 3.1: New policy to apply Complete Streets</li> </ul>

Existing (2014) Circulation Element	Proposed 2025 Circulation Element Update	Summary of Changes
		<p>principles to improvements to serve all modes of travel.</p> <ul style="list-style-type: none"> <li>• Addition of Policy 3.2: New policy to identify and address gaps in the transportation network.</li> <li>• Addition of Policy 3.3: New policy to encourage grant funding opportunities to improve school safety.</li> <li>• Addition of Policy 3.4: New policy to assist in designing Complete Streets.</li> <li>• Addition of Policy 3.5: New policy to recognize implementation challenges with new technologies.</li> <li>• Addition of Policy 3.6: New policy to address the need for emerging autonomous vehicles and transportation networks by designing spaces with pick-up and drop-off.</li> </ul>
Trails Network (Goal 4)	Bicycle and Pedestrian System (Goal 4)	<p>Text changes to Goal 4 and related policies. One policy was removed. Addition of six new policies.</p> <ul style="list-style-type: none"> <li>• Text change to Goal 4: Goal is renamed "Bicycle and</li> </ul>

Existing (2014) Circulation Element	Proposed 2025 Circulation Element Update	Summary of Changes
		<p>Pedestrian System"; removed reference to City to reflect consideration of larger area.</p> <ul style="list-style-type: none"> <li>Text change to Policy 4.1 (renumbered as Policy 4.2): Made policy more succinct and more broadly applicable.</li> <li>Policy 4.2 removed and replaced with new policies to provide additional details on specific active transportation design and implementation elements.</li> <li>Addition of Policy 4.1: Added specification about roadway design elements to support bikes and pedestrians.</li> <li>Addition of Policy 4.3: Added bike and pedestrian amenity requirements for new developments.</li> <li>Addition of Policy 4.4: Added land use connectivity requirements for new developments.</li> <li>Addition of Policy 4.6: Provided additional specification as to the appropriate type of amenities.</li> </ul>

Existing (2014) Circulation Element	Proposed 2025 Circulation Element Update	Summary of Changes
		<ul style="list-style-type: none"> <li>• Policy 4.3: Renumbered as Policy 4.7.</li> <li>• Addition of Policy 4.5: New policy to encourage funding opportunities for bicycle projects.</li> <li>• Addition of Policy 4.8: New policy to recognize challenges with new technologies such as e-bikes.</li> </ul>
--	Public Transportation System (Goal 5)	<p>Goal 3 of Existing (2014) Circulation Element is renumbered as Goal 5 in the proposed Circulation Element Update. Text changes to policies and addition of one new policy.</p> <ul style="list-style-type: none"> <li>• Text change to Policy 3.1 (renumbered as Policy 5.1): Reworded to reflect City's limited influence with respect to public transportation decisions.</li> <li>• Policy 3.2: Renumbered as Policy 5.2.</li> <li>• Policy 3.3 removed and replaced with a similar policy (Policy 2.3).</li> <li>• Text change to Policy 3.4 (renumbered as Policy 5.3):</li> </ul>

Existing (2014) Circulation Element	Proposed 2025 Circulation Element Update	Summary of Changes
		<ul style="list-style-type: none"> <li>Added specification about the type of systems to be addressed.</li> <li>Policy 3.4: Renumbered as Policy 5.4.</li> <li>Addition of Policy 5.5: New policy to promote use of transportation demand management (TDM) to reduce impacts of vehicles.</li> </ul>
<b>Related Goals and Policies</b> <ul style="list-style-type: none"> <li>Identifies goals and policies from other General Plan Elements that directly or indirectly support the goals and policies of the Circulation Element</li> </ul>	<b>Related Goals and Policies</b> <ul style="list-style-type: none"> <li>Identifies goals and policies from other General Plan Elements that directly or indirectly support the goals and policies of the Circulation Element</li> </ul>	Minor text changes and updated Table C-1 (which identifies related goals and policies from other General Plan Elements) to be consistent with updates made to other General Plan Elements since adoption of the Existing (2014) Circulation Element.
<b>Circulation Plan</b> <ul style="list-style-type: none"> <li>Describes the local and regional circulation system; identifies vehicular transportation as primary mode of travel, introduces Arterial Highway Plan, and alternative transportation modes; identifies that Circulation Plan is based on issues, goals, and policies of the Circulation Element, and introduces Circulation Element Implementation Program (Appendix A).</li> </ul>	<b>Circulation Plan</b> <ul style="list-style-type: none"> <li>Describes the local and regional circulation system; identifies vehicular transportation as primary mode of travel, introduces Arterial Highway Plan, and alternative transportation modes; identifies that Circulation Plan is based on issues, goals, and policies of the Circulation Element, and introduces Circulation</li> </ul>	Minor text changes to reflect word choice; no changes to content.

Existing (2014) Circulation Element	Proposed 2025 Circulation Element Update	Summary of Changes
	Element Implementation Program (Appendix A).	
<i>Local Circulation System</i> <ul style="list-style-type: none"> <li>Defines roadway functional classifications (Major Arterial, Primary Arterials, Secondary Arterials, and Collectors)</li> </ul>	<i>Local Circulation System</i> <ul style="list-style-type: none"> <li>Defines roadway functional classifications (Major Arterial, Primary Arterials, Secondary Arterials, and Collectors)</li> </ul>	Minor text changes for clarity purposes; no changes to roadway functional classifications. The Circulation Element Update incorporates a discussion on the City's Transportation Study Guidelines, which are established to determine methods of analysis for new development projects.
Performance Criteria	Performance Criteria	Minor text changes for clarity purposes.
Relationship to Land Use	Relationship to Land Use	Text changes to clarify that the Circulation Element Update was developed in accordance with implementation of the City's General Plan based on the development capacity identified in Table LU-3 of the 2024 General Plan Land Use Element, including the sites identified as suitable for housing development in the 2021-2029 Housing Element.
General Plan Circulation System	General Plan Circulation System	Minor text changes for clarity purposes.
Truck Traffic	Truck Traffic	Minor text changes; clarified the only designated truck route in the City is Foothill Transportation Corridor (SR-241).
Neighborhood Traffic Safety	Neighborhood Traffic Safety	Minor text changes for clarity purposes.

Existing (2014) Circulation Element	Proposed 2025 Circulation Element Update	Summary of Changes
Regional Circulation System	Regional Circulation System	Minor text changes for clarity purposes and to update text based on changes to regional roadways (i.e., completion of SR-241).
--	Complete Streets	Added new section on Complete Streets to accommodate a variety of transportation modes and users.
Public Transportation and Trails Network	Bicycle and Pedestrian System Public Transportation System	The “Public Transportation and Trails Network” was renamed and separated into two subsections. The new “Bicycle and Pedestrian System” expands the discussion of bicycle and pedestrian facilities and modes of travel, including e-bikes. Similarly, the new “Public Transportation System” expands the discussion of local and regional transit service.
Transportation System and Demand Management	--	Section has been removed. The topic of transportation demand management (TDM) strategies is now addressed in Goal 5 of the Circulation Element Update, including the addition of Policy 5.5.
Transportation Financing	--	Section has been removed.
<b>Figures</b> <ul style="list-style-type: none"> <li>Figure C-1: Rancho Santa Margarita Layered Transportation Networks</li> </ul>	<b>Figures</b>	Figure C-1, which provided a graphic representation of the City's layered transportation networks, was replaced

Existing (2014) Circulation Element	Proposed 2025 Circulation Element Update	Summary of Changes
<ul style="list-style-type: none"> <li>• Figure C-2: Typical Roadway Cross-Sections</li> <li>• Figure C-3: General Plan Roadway Network</li> <li>• Figure C-4: Potential Transit Network</li> <li>• Figure C-5: Bikeway Network</li> <li>• Figure C-6: Pedestrian Network</li> </ul>	<ul style="list-style-type: none"> <li>• Figure CIR-1: Connect SoCal 2024 Neighborhood Mobility Area (NMA)</li> <li>• Figure CIR-2: Typical Roadway Cross-Sections</li> <li>• Figure CIR-3: Roadway Functional Classifications</li> <li>• Figure CIR- 4: Pedestrian Network</li> <li>• Figure CIR-5: Existing and Proposed Bikeway Facilities</li> <li>• Figure CIR-6: Existing Bus Routes</li> </ul>	<p>with Neighborhood Mobility Areas identified in Connect SoCal 2024. Figure C-3 was renamed “Roadway Functional Classifications.” No changes were made to these classifications.</p> <p>Figure C-4 was renamed “Existing Bus Routes” and renumbered to CIR-6. This figure was updated to reflect existing transit routes provided by Orange County Transportation Authority.</p> <p>Figure C-5 was updated to include proposed bikeway facilities.</p> <p>Figure C-6 was renumbered CIR-4; no changes were made to the pedestrian network.</p>
<p><b>Tables</b></p> <ul style="list-style-type: none"> <li>• Table C-1: Related Goals and Policies by Element</li> <li>• Table C-2: Roadway Classifications and Daily Capacities</li> <li>• Table C-3: Circulation System Performance Criteria</li> <li>• Table C-4: Peak Hour Level of Service Ranges</li> <li>• Table C-6: Bikeway Classification Descriptions</li> </ul>	<p><b>Tables</b></p> <ul style="list-style-type: none"> <li>• Table CIR-1: Circulation-Related Goals and Policies by Element</li> <li>• Table CIR-2: Roadway Classifications and Daily Capacities</li> <li>• Table CIR-3: Peak Hour Level of Service Ranges</li> </ul>	<p>Table C-3 was removed.</p> <p>Table C-6 was removed; information from this table is retained in the Circulation Element Update but has been updated/reformatted.</p>

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### **3 ENVIRONMENTAL APPROACH AND ANALYSIS**

This analysis has been prepared to determine whether the proposed Project would result in any new significant impacts or a substantial increase in the severity of previously identified significant impacts in the 2020 certified General Plan FEIR. Based on substantial evidence, the City has concluded that the proposed Project does not meet the criteria for preparing a subsequent or supplemental EIR under Public Resources Code Section 21166 or CEQA Guidelines Section 15162.

The scope of the City's review of the proposed Project is limited by provisions set forth in CEQA and the State CEQA Guidelines. This review is limited to evaluating whether the proposed Circulation Element Update Project would trigger further environmental analysis beyond the 2020 General Plan FEIR. This analysis also reviews new information, if any, of substantial importance that was not known and could not have been known with the exercise of reasonable due diligence at the time the 2020 General Plan FEIR was certified. This evaluation includes a determination as to whether the changes proposed by the proposed Project would result in any new significant impacts or a substantial increase in a previously identified significant impacts.

This analysis assesses the potential impacts associated with the proposed Circulation Element Update. This analysis provides the City with the factual basis for determining whether any changes in the proposed Project, any changes in circumstances, or any new information since the 2020 FEIR was certified would require additional environmental review or preparation of a Subsequent EIR or Supplemental EIR.

#### **Transportation**

The Project proposes an update to the existing (2014) Circulation Element to support State and regional transportation efforts to provide for a safe, efficient, and adequate multi-modal circulation system, and to reflect the current regulatory setting, including recently adopted amendments to the General Plan Land Use Element, Housing Element, and Safety Element. As discussed in Section 1, Introduction, the General Plan FEIR evaluated the potential environmental impacts that could occur under implementation of the recently adopted amendments to the General Plan Land Use Element, Housing Element, and Safety Element. The proposed Circulation Element Update would not result in any modifications to existing land use designations or modify any existing roadways or roadway classifications or authorize for any specific circulation system projects or improvements. The Circulation Element Update continues to identify key issues related to circulation and provides goals and policies to regulate existing and future circulation conditions throughout the City.

The updated Circulation Element identifies regulatory requirements that have gone into effect since the existing (2014) Circulation Element was adopted, including SB 743. SB 743 promotes the reduction of greenhouse gas emissions, the development of multi-modal transportation networks, and a diversity of land uses. Previously, CEQA transportation analyses of individual projects focused on the determination of impacts in terms of roadway capacity and vehicles. SB 743

changed transportation impact analysis as part of CEQA compliance, replacing the determination of impacts based on roadway and intersection operating conditions to vehicle miles traveled (VMT).

The Circulation Element Update includes a new policy (Policy 1.6) which requires new development projects to prepare transportation studies consistent with the City's Transportation Study Guidelines. The updated Circulation Plan incorporates a discussion of the City's Transportation Study Guidelines, which have been established to detail the requirements for conducting the VMT analysis portion of the CEQA transportation impact analysis and for conducting LOS analysis, site access assessments, and other transportation analyses for non-CEQA purposes. The Transportation Study Guidelines are to be used in the preparation of transportation studies that are normally required as part of the application review and processing of land development projects.

The Transportation Study Guidelines include a chapter that discusses the requirements for conducting a VMT-based transportation impact analysis of a development project to fulfill CEQA requirements including the process to aid in determining if a detailed VMT analysis is needed. The Transportation Study Guidelines also include a chapter that discusses the requirements for the non-CEQA transportation assessment. The City of Rancho Santa Margarita has adopted vehicle LOS standards for City roadways and intersections. These standards are contained within the General Plan Circulation Element and therefore apply to new development projects. The LOS performance standards remain unchanged from the current (2014) Circulation Element. While the Transportation Study Guidelines identify when an LOS analysis of local facilities will be required and how the assessment must be carried out, neither the Circulation Element nor the Transportation Study Guidelines identify or recommend any specific improvements or remedies in the event a minimum LOS performance standard is not maintained. The Circulation Element Update does not propose or provide for site-specific development. Future development projects would be reviewed relative to the Transportation Study Guidelines to ensure compliance with CEQA Guidelines Section 15064.3 subdivision (b). If a project does not meet the requirements for VMT screening, an analysis of VMT impacts would be required. If a project would result in significant VMT impacts, mitigation measures would be required to reduce or eliminate the impact. Thus, the Circulation Element Update would support implementation and compliance with CEQA Guidelines Section 15064.3 subdivision (b).

As noted above, the proposed Circulation Element Update would not modify any existing roadways or roadway classifications. Existing evacuation routes would remain unchanged. The Circulation Element Update includes the addition of a new policy (Policy 1.9) to facilitate future evacuation planning. Policy 1.9 would incorporate necessary improvements and maintenance to evacuation routes consistent with the Safety Element, which was previously updated.

The Project would not result in new significant transportation impacts or a substantial increase in the severity of previously identified significant impacts.

## Air Quality

The Project proposes an update to the existing (2014) Circulation Element to support State and regional transportation efforts to provide for a safe, efficient, and adequate multi-modal circulation system, and to reflect the current regulatory setting, including recently adopted amendments to the General Plan Land Use Element, Housing Element, and Safety Element. As discussed in Section 1, Introduction, the General Plan FEIR evaluated the potential environmental impacts that could occur under implementation of the recently adopted amendments to the General Plan Land Use Element, Housing Element, and Safety Element. The proposed Circulation Element Update would not result in any modifications to existing land use designations or modify any existing roadways or roadway classifications or allow for any specific circulation system projects or improvements.

The changes proposed continue to emphasize providing a safe and efficient circulation system with greater emphasis on providing a circulation system that supports multi-modal transportation, which would contribute to reduced automobile trips and VMT, supporting improved air quality within the South Coast Air Basin (SCAB). Proposed policies provide for a safe circulation system that facilitates the efficient flow of traffic and goods; a local circulation system that is integrated with the larger regional transportation system; a safe and convenient transportation network accessible for all transportation modes and users; extensive public bikeway and community pedestrian networks that facilitate and encourage non-vehicular travel; and a network that promotes the increased use of multi-modal transportation. Integration of the local circulation system into the larger regional transportation system would provide for local connections to existing regional trails and encourage a transportation network that balances traffic flow and multi-modal needs. Increased and improved opportunities for multi-modal transportation that results in fewer vehicular trips both locally and regionally, further contributes to state and regional air quality goals.

Any future circulation improvement projects, consistent with the General Plan Circulation Element Update, would undergo environmental review on a project-by-project basis and would be reviewed for consistency with policies, programs, and the established regulatory framework aimed at reducing potential air quality impacts. If necessary, mitigation would be recommended to reduce potential impacts to a less than significant level.

The Project would not result in new significant air quality impacts or a substantial increase in the severity of previously identified significant impacts.

## Greenhouse Gas Emissions

The proposed Circulation Element Update would not result in any modifications to existing land use designations or modify any existing roadways or roadway classifications or allow for any specific circulation system projects or improvements. As discussed above, the changes proposed continue to emphasize providing a safe and efficient circulation system with greater emphasis on providing a circulation system that supports multi-modal transportation, which would contribute

to reduced automobile trips and VMT, resulting in reduced greenhouse gas emissions. Proposed policies provide for a safe circulation system that facilitates the efficient flow of traffic and goods; a local circulation system that is integrated with the larger regional transportation system; a safe and convenient transportation network accessible for all transportation modes and users; extensive public bikeway and community pedestrian networks that facilitate and encourage non-vehicular travel; and a network that promotes the increased use of multi-modal transportation. Integration of the local circulation system into the larger regional transportation system would provide for local connections to existing regional trails and encourage a transportation network that balances traffic flow and multi-modal needs. Increased and improved opportunities for multi-modal transportation that results in fewer vehicular trips both locally and regionally, further contributes to state and regional greenhouse gas emissions reduction goals.

Additionally, as discussed in the Transportation discussion above, the Circulation Element Update includes a new policy (Policy 1.6) which requires new development projects to prepare transportation studies consistent with the City's Transportation Study Guidelines. The Transportation Study Guidelines include a chapter that discusses the requirements for conducting a VMT-based transportation impact analysis of a development project to fulfill CEQA requirements including the process to aid in determining if a detailed VMT analysis is needed. Future development projects would be reviewed relative to the Transportation Study Guidelines to ensure compliance with CEQA Guidelines Section 15064.3 subdivision (b). If a project does not meet the requirements for VMT screening, an analysis of VMT impacts would be required. If a project would result in significant VMT impacts, mitigation measures would be required to reduce or eliminate the impact. Thus, the Circulation Element Update would support the reduction of VMT through the analysis of future development projects and the implementation of mitigation measures, if necessary. Reduced VMT provide for reduced GHG emissions associated with individual development projects.

The Project would not result in new significant greenhouse gas emissions impacts or a substantial increase in the severity of previously identified significant impacts.

## **Remaining Environmental Issue Areas**

The proposed Circulation Element Update would not result in any impacts associated with the following environmental issue areas:

- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources

- Noise
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

As discussed in Section 2, Description of the Proposed Project, the proposed Circulation Element Update includes minor revisions to language, tables, and figures to update existing conditions and to better reflect the community's circulation needs relative to more recent updates to the Land Use and Housing Elements. As discussed in Section 1, Introduction, the potential environmental impacts associated with the more recent updates to the Land Use Element, Housing Element and Safety Element were previously evaluated in the General Plan FEIR. The proposed Circulation Element Update would not result in any modifications to existing land use designations or modify any existing roadways or roadway classifications or modify any General Plan policies or programs specific to any of the above listed environmental issue areas. The changes proposed to the Circulation Element continue to emphasize providing a safe and efficient circulation system with greater emphasis on providing a circulation system that supports multi-modal transportation.

No specific circulation system projects or improvements with the potential for physical changes to the environment are proposed as part of the Circulation Element Update. Potential future circulation improvement projects, consistent with the General Plan Circulation Element Update, would undergo environmental review on a project-by-project basis and would be reviewed for consistency with policies, programs, and the established regulatory framework aimed at reducing potential direct or indirect environmental impacts. If necessary, mitigation would be recommended to reduce potential impacts to a less than significant level.

The Project would not result in new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts. (Public Resources Code § 21166; CEQA Guidelines § 15162.)

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## **4 ADDENDUM FINDING**

As detailed herein, on the basis of substantial evidence in the light of the whole record, a Subsequent or Supplemental EIR is not required for the proposed Circulation Element Update because none of the criteria requiring such a document under Public Resources Code Section 21166 or State CEQA Guidelines section 15162 are met.

The Circulation Element Update would result in no new significant impacts that were not analyzed in the 2020 General Plan FEIR, nor would the proposed Project cause a substantial increase in the severity of any previously identified significant impacts. The potential impacts associated with the proposed Project would either be the same or less than those described in the 2020 General Plan FEIR. In addition, there are no substantial changes to the circumstances under which the proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the 2020 General Plan FEIR, nor has any new information regarding the potential for new or more severe significant environmental impacts been identified. Therefore, in accordance with Section 15164 of the State CEQA Guidelines, this Addendum to the previously certified 2020 General Plan FEIR has been prepared for the proposed Circulation Element Update. In taking action on any of the Project, the decision-making body must consider the whole of the data presented in the 2020 General Plan FEIR and this Addendum.

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Circulation Element Update

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