ADDENDUM TO THE GENERAL PLAN EIR

SCH No. 2015081020

FOR THE

Circulation Element Update

City of Palm Desert

Prepared for:

City of Palm Desert

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1. Addendum to the Adopted General Plan EIR for Update to the Mobility Element

1.1 BACKGROUND AND OVERVIEW

This document is an Addendum to the previously certified Environmental Impact Report (EIR) (State Clearinghouse [SCH] No. 2015081020) for the Palm Desert General Plan, which was certified on November 10, 2016 (referred to as the "existing General Plan"). The purpose of this Addendum is to evaluate whether the proposed update to the Mobility 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 Mobility 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 City of Palm Desert has prepared an update to its existing Mobility Element within the City's General Plan, which was last updated in 2016. The update focused on enhancing the City's multi-modal transportation system to improve connectivity, roadway safety, and travel option availability. The updated Mobility Element included goals, policies, and actions to guide changes to the City's transportation network over the next 15 years.

Since the last General Plan Update, several state policies and regulations have been put in place addressing vehicle miles of travel (VMT), roadway safety, goods movement/truck routes, and roadway right-of-way (ROW) preservation for new developments, among others. The City also intends to clarify transportation goals and address inconsistencies between the existing Mobility Element and other specific and area plans adopted by the City.

Key Project elements include:

- Updating the City's roadway cross sections and classifications to align with existing conditions, improve consistency with specific/area plans, and support ROW preservation for new

developments. This process adds complete street measures enabling all forms of transportation, not just automobiles.

- Reclassifying Country Club Drive from a vehicle-oriented arterial with six planned lanes (three in each direction) to a balanced arterial with four travel lanes (two in each direction) and improved bicycle facilities.
- Enhancing the City's bicycle and pedestrian network and ensuring consistency with recently completed and planned improvements.
- Refining the City's truck route network to improve freight connectivity and remove exposure of trucks to sensitive receptors and areas of high pedestrian activity consistent with AB 98 requirements.
- Incorporating recommendations from the City's Vision Zero Action Plan, Active Transportation Plan, and City Center Area Plan.
- Clarifying policies and actions within the General Plan to align with state regulations and improve consistency.
- Adopting updated *Transportation Study Guidelines: CEQA Vehicle Miles Traveled (VMT) and Level of Service (LOS) Safety and Multimodal Operations Assessment*.

1.3 CERTIFIED EIR

The General Plan EIR discusses mitigation measures to be implemented by the City to reduce potential adverse environmental impacts to a level that is considered less than significant. Such mitigation measures are noted in the EIR, and in the associated mitigation and monitoring program (MMRP) are discussed and presented in the following sections: Biological Resources, Cultural Resources, Public Services and Utilities and Transportation.

However, even with the application of feasible mitigation measures, some environmental impacts could not be reduced to less-than-significant levels. The significant and unavoidable impacts are identified below.

Significant and Unavoidable Impacts

Greenhouse Gas Emissions

Impact 4.4-1 Generate greenhouse gas emissions that may have a significant impact on the environment and inhibit the goals of Assembly Bill 32. Adoption and implementation of the proposed General Plan would result in new development and redevelopment of property throughout the planning area, which would result in GHG emissions from construction activities that would contribute to the cumulative effect of climate change.

Transportation

Impact 4.15-2 Conflict with Caltrans Performance Standards. Adoption and implementation of the General Plan update would not result in unacceptable performance at the single Caltrans intersection in Palm Desert, but would contribute to unacceptable performance along six freeway segments.

Impact 4.15-10 Cumulative Conflict with Caltrans Performance Standards. Adoption and implementation of the General Plan update would not result in unacceptable performance at the single Caltrans intersection in Palm Desert, but would contribute to unacceptable performance along six freeway segments.

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.

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 update the Mobility Element Update with minor modifications to the existing and proposed street network. As part of the implementation of the Mobility Element the City will adopt *Transportation Study Guidelines: CEQA Vehicle Miles Traveled (VMT) and Level of Service (LOS) Safety and Multimodal Operations Assessment.* The Traffic Study Guidelines (TSG) establish procedures for determining when a VMT analysis is required, and what level of change in VMT warrants further study. The intent of the TSG is to help streamline those projects that fall within the screening criteria shown in Section 4.2 of the TSG. The screening criteria allow for some land use and transportation projects to move forward without VMT analysis as they are known to have little to no increase in VMT. In general land uses such as parks, schools and daycare centers are expected to serve the local population to encourage walking or at least shorter vehicle trips than regional commercial or industrial centers. Similarly, transportation projects that add safety, pedestrian amenities, and allow for

new transit options are expected to reduce VMT and as such are also relieved of the need for further study.

Rather than a specific number for VMT reduction the TSG includes **Table 1: City of Palm Desert "Project Generated" VMT Thresholds of Significance.** As shown in Table 1, VMT analysis is comparative to Riverside County as a whole so the level of significance will change over time.

Table 1: City of Palm Desert "Project Generated" VMT Thresholds of Significance

Project Type	Metric	VMT Threshold
Residential	Home Based VMT per Resident	Below General Plan Buildout county-average VMT per resident
Non-Residential	VMT per Service Population OR Home Based Work (Commute) VMT per Employee[1]	Below General Plan Buildout county-average VMT per service population
Mixed Use Developments[1]	VMT per Service Population	Below General Plan Buildout county-average VMT per service population
Transportation Project	Total VMT	Consistent with the SCAG RTP/SCS and/or City General Plan. If not consistent with the SCAG RTP/SCS and or City General Plan, no net change in city-wide VMT compared to the General Plan Buildout condition

Source: City of Palm Desert Transportation Study Guidelines (TSG)

[1] "Mixed use" is defined as a project on a single site with two or more distinct land uses.

The TSG requires mitigation for those projects that do not screen, or demonstrate impact below the thresholds in Table 1. Mitigation options, discussed in Section 4.4 Mitigation of the TSG include:

1. Modify the project description to reduce VMT generated by the project. This could include higher residential density, additional mixture of land uses, or a reduction in added lane miles.
2. Implement transportation demand management (TDM) measures to reduce VMT generated by the project.
3. Participate in a VMT fee program and/or VMT mitigation exchange (if they exist) to reduce VMT from the project.

The mitigation measures would need to be fully described and included in the TSG analysis before consideration of the development project.

A copy of this addendum, and all supporting documentation, may be reviewed or obtained at the City of Palm Desert, Palm Desert City Hall, 73510 Fred Waring Drive, Palm Desert CA 92260, Monday through Friday, 8:00 am to 5:00 pm.

2. CEQA Analysis

2.1 ENVIRONMENTAL ANALYSIS

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. However as noted above, the air quality impacts are significant and unavoidable. While the Mobility Element would expand transportation options including transit, cycling, and walking, the reductions in vehicle trips would likely not be sufficient to reduce air quality impacts to less than significant.

The revised roadway configurations with right of way standards and additional improvements for connectivity, walking, cycling, and transit will provide more mobility options for the public. The new roadway configurations are a refinement of those found in the existing Mobility Element and have more engineering detail that will aid in communicating expectations with developers and property owners when designing projects. The refined roadway sections are not substantially different from the existing standards. Development of future roadways consistent with the new Mobility Element will either require their own environmental analysis or be part of adjacent projects and included in the project-specific environmental analysis.

The adoption of the TSG will ensure that VMT is evaluated for new projects. First for screening to allow streamlining if the project fits within the appropriate thresholds, and if not to guide the study of project VMT. Thresholds included in the TSG will determine the level of project-specific analysis that is required (i.e. negative declaration, mitigated negative declaration, or environmental impact report). The proposed project is a refinement of the existing Mobility Element and nothing in the proposed Mobility Element or TSG would increase impacts beyond those evaluated in the General Plan EIR.

2.2 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

3. CEQA Analysis

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 proposed Mobility Element is a refinement of the existing Mobility Element with minor modifications to reflect changes in state law (AB 98, SB 932) and to improve connectivity for all types of travel. As such, there are no new significant environmental impacts that have been identified beyond those already assessed in the General Plan EIR. While future projects developed consistent with the Mobility Element may result in physical impacts from construction, the analysis and mitigation measures from the General Plan EIR will still apply. In addition, future projects will also be required to conduct their own environmental analysis that will ensure compliance with existing city and regional regulations. For example, as disclosed on page 4.4-20 of the Draft EIR, "*Implementation of programs and policies, derived largely from the General Plan, will further reduce potential GHG related impacts as it is impossible, due to limitations in the modeling software, to quantify the effectiveness of every General Plan policy provision. Individual development projects will be required to undergo project-specific environmental review, and mitigation measures will be identified at that time to reduce any significant impacts." All projects must meet the requirements of the South Coast Air Quality Management District (SCAQMD) 2022 Air Quality management plan (AQMP)*

Despite application of existing policy and mitigation measures, the development of the General Plan will contribute to cumulative greenhouse gas emissions and regionally. The proposed Mobility Element provides the ability to reduce the amount of traffic and therefore reduce the amount of greenhouse gas emissions, however there is no certainty that the reductions will be realized, and if realized, measurable within the City. In the context of this finding, the proposed project would not result in new significant environmental effects or a substantial increase in the severity of the greenhouse gas impacts disclosed in the General Plan EIR.

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. With the passage of SB 743, LOS impacts are no longer considered significant under CEQA. LOS is included here as it was part of the General Plan EIR.

All other impacts and mitigation measures outlined in the General Plan EIR will remain applicable.

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.

The General Plan EIR did not evaluate VMT specifically since it was not required at the time, so the project team modeled VMT using the Riverside County travel demand model (RIVCOM 4.0.1. The land use Socioeconomic Data (SED) assumptions for each model year are summarized in Table 1 of the November 6, 2025 Fehr and Peers VMT and LOS results memo. RIVCOM uses a 2018 base year and 2045 future year. Existing Conditions (2025) and Horizon (2040) years were estimated by interpolating between the base and future year models.

Housing unit and employment inputs were updated for the City and adjacent Coachella Valley region based on information provided by the City and CVAG (Measure A housing units). This ensured that all housing units, including seasonal/vacation homes, were accounted for in the model. Demographics were also updated to reflect the typical populations of seasonal homes (older households and households without employment). Pending and approved development projects were also reviewed for consistency within the model. Projects not already accounted for by the growth in the General Plan were added to the model.

The proposed land use changes as part of the University Neighborhood Specific Plan (UNSP) update effort currently underway were incorporated into the land use inputs for modeling, dated November 4, 2025.

VMT Modeling

In evaluating VMT, Fehr & Peers used three different methods:

1. **Origin-Destination (OD).** The OD Method is used to calculate VMT generated by a City for transportation impact analysis. This method evaluates 100 percent of the trip length with one or both trips ending within a jurisdiction (also known as the Full Accounting Method). This method aggregates passenger vehicles and trucks into one VMT forecast.
2. **Production-Attraction (PA)**. The PA Method isolates VMT by trip purpose. This method does not account for trips that extend beyond the model boundary and does not include truck VMT. This methodology may be appropriate for projects with a single use and with relatively low levels of visitor/external trips.
3. **Boundary Method**. The Boundary Method multiplies the volume on each roadway segment by the segment length within a specified geographic boundary. This method includes trips on the roadway within that boundary, without discriminating where the trip began or ended. The boundary method is used to understand the VMT effect throughout the City, which is inclusive of trips within the boundary that may take longer routes due to congestion along corridors. The boundary utilized in the assessment is the City of Palm Desert boundary.

Table 2 provides a summary of the results of the VMT calculations using the above methodologies. As shown in Table 2, the change in VMT reported in all three methods are minor and in two of the three methods the proposed Mobility Element reduces VMT when compared to the existing Mobility Element.

Table 2: VMT Change Summary for OD, PA, and Boundary Method

Metric	2025	Current Mobility Element (2040)	Proposed Mobility Element (2040)	Change in VMT
Origin-Destination (OD)	33.8	32.4	32.0	-0.4
Production-Attraction (PA)	29.4	28.6	29.1	0.5
Boundary Method	8.7	8.5	8.2	-0.3

Source: Fehr & Peers, 2025

Level of Service

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.

As shown above, while VMT was not evaluated in the General Plan EIR, the new calculations demonstrate that the proposed Mobility Element would result in a slight reduction from the calculations associated with the existing element. As such, the proposed project would not result in new or more significant impacts than were discussed in the General Plan EIR.

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

The General Plan EIR identifies significant and unavoidable impacts to greenhouse gas and traffic. 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. 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 General Plan EIR would remain applicable ensuring that future projects address 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. The proposed project is expected to have similar significant impacts to those outlined in the General Plan EIR, and all associated policies and mitigation measures identified 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 mobility, 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 the Mobility Element, no additional mitigation measures or alternatives are required for the proposed project.

References

City of Palm Desert Mobility Element Update Final VMT and LOS Results, (Fehr&Peers, 2025) November 6, 2025.