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BIOLOGICAL
DIVERSITY

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The Center for Biological Diversity is a national, nonprofit conservation organization with more than 1.7 million members and online activists dedicated to the protection of endangered species and wild places.

**Wildfire Evacuation
Planning and the California
Environmental Quality Act**

- An EIR should alert the public and decision-makers to environmental changes **before** the “point of no return.”
 - *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376
- “The EIR should evaluate any potentially significant direct, indirect, or cumulative environmental impacts of locating development in areas susceptible to hazardous conditions (e.g., ... **wildfire risk areas**)...”
 - CEQA Guidelines, § 15126.2

CEQA GUIDELINES APPENDIX G

VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

...

(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

(b) [wildfire smoke and pollutants]

(b) [wildfire management infrastructure]

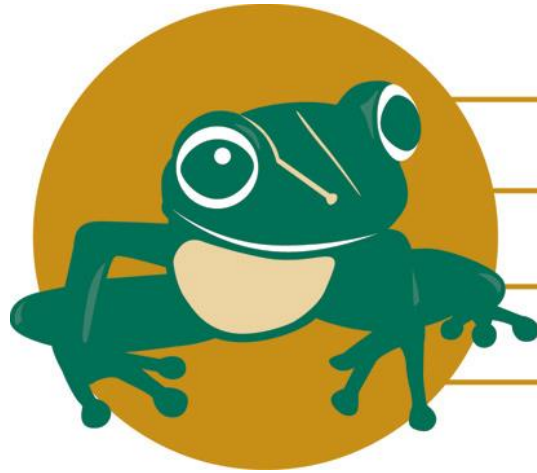
(d) [post-wildfire risks such as landslides]

What we're seeing:

- Emphasis on emergency response plans
- Reliance on local fire officials
- “Modeling is too complex”
- Emphasis on number of egress points
- Focus on structure loss

What we want to see:

- Evacuation *study*, not just *plans*
 - Number of project vehicles
 - Total time to evacuate project site
 - Evacuation routes and roadway capacity
 - Additional evacuation time for *existing* residents
- Modeling (best- and worst-case scenarios)
- Candor: significant and unavoidable impact?



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Check out our report on wildfire and development in California:

<https://www.biologicaldiversity.org/programs/urban/pdfs/Built-to-Burn-California-Wildfire-Report-Center-Biological-Diversity.pdf>