Fehr & Peers

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Evacuation Impact Assessment Checklist

A Qualitative CEQA Analysis Tool

This checklist provides a framework to gather evidence, evaluate a project's potential for significant evacuation-related impacts, and identify appropriate mitigation strategies related to California Environmental Quality Act (CEQA) evacuation impact assessments. While wildfire is the primary focus, other hazards may be relevant where they affect evacuation routes.

Mark each question *Yes*, *No*, or *Requires Further Analysis*. The determination of significance rests with the lead agency, based on the totality of evidence. See the end of this document for interpretation guidance, notes, and regulatory references.

	Responses that could lead to a **significant impact** conclusion
	Responses that could lead to a **less-than-significant impact** conclusion
	Responses that **require further analysis**

Table 1. Evacuation Impact Assessment Checklist

Question	Yes	No	Requires Further Analysis
1. Project Characteristics			
Project Location and Density			
Is the project located within a state responsibility area or local responsibility area, and within or near an area designated as a high or very high fire hazard severity zone?[1] *A Yes response alone may constitute sufficient evidence for the lead agency to find a potentially significant impact.*	☐	☐	☐
Is the project located in or near any other defined hazard zone (e.g., flood plain, seismic fault zone, liquefaction zone) that could affect existing evacuation routes during a wildfire?	☐	☐	☐

[1] Fire Hazard Severity Zone maps are maintained by CAL FIRE. Local responsibility area designations are determined by local jurisdictions. Verify current zone designations against the most recent CAL FIRE mapping.

Question	Yes	No	Requires Further Analysis
Is the project characterized by low- to intermediate-density uses that are dispersed, which could increase the potential for wildfire to start or spread?	☐	☐	☐
Is the project a new low-density development within the wildland-urban interface, surrounded largely by open space?	☐	☐	☐
Is the project located on ridges, in rugged terrain, or along high-wind corridors?	☐	☐	☐
Evacuation Communication Barriers[2]			
Does the project population and/or surrounding community meet or exceed the city/county/regional average share of senior householders (age 65+) living alone?	☐	☐	☐
Does the project population and/or surrounding community meet or exceed the city/county/regional average share of households with limited English speakers?	☐	☐	☐
Does the project population and/or surrounding community meet or exceed the city/county/regional average share of households with limited internet access?	☐	☐	☐
Does the project population and/or surrounding community meet or exceed the city/county/regional average share of households with children under age 5?	☐	☐	☐
Does the project population and/or surrounding community meet or exceed the city/county/regional average share of households with limited vehicle access (0–1 vehicles per household)?	☐	☐	☐
Does the project population and/or surrounding community meet or exceed the city/county/regional average share of residents with a disability that may impair their ability to evacuate?	☐	☐	☐
Project Wildfire Risk Reduction Measures			
Would the project comply with all California Fire Safe Regulations (Public Resources Code § 4290) for new streets and buildings?	☐	☐	☐
Would the project provide new firefighting facilities or staffing?	☐	☐	☐

[2] Evacuation communication barriers reflect social vulnerability factors that may impair a population's ability to receive, understand, or act on evacuation warnings in a timely manner.

Question	Yes	No	Requires Further Analysis
Is the project located within the average response time of the nearest fire station?[3]	☐	☐	☐
2. Emergency Vehicle Access/Egress and Evacuation Routes			
Does the project have only one access route for emergency vehicles?	☐	☐	☐
Would the project provide early detection for emergency events and/or enhanced notification systems for evacuation?	☐	☐	☐
Do the evacuation routes affected by project-generated traffic meet all California Fire Safe Regulations (Public Resources Code § 4290) — including roadway surface, grade, width, and length standards?	☐	☐	☐
Have first responders indicated in writing that they have sufficient resources to manage evacuation traffic, such that strategies like contraflow are feasible?	☐	☐	☐
Does the project or jurisdiction provide emergency evacuation buses and designated pickup sites through the school district or public transportation?	☐	☐	☐
Does the project's jurisdiction have a current safety element compliant with AB 747 (2019), AB 1409 (2021), SB 99 (2019), and SB 1241 (2012)?	☐	☐	☐
3. Project's Evacuation Impact on the Community			
Would the project conflict with or remove any previously identified community evacuation routes?	☐	☐	☐
Have prior evacuations triggered by wildfire or other emergency events resulted in fatalities and/or significant injuries in the project area?	☐	☐	☐
Would the project substantially change the emergency response or evacuation plan for the surrounding community given its location and scale?	☐	☐	☐
Is there data indicating that wildfire (or other hazard) spread could result in closure of key evacuation routes before full community evacuation is complete?	☐	☐	☐
Would the project worsen baseline evacuation times for the existing community?[4]	☐	☐	☐

Reset Checklist

[3] Average fire station response times vary by jurisdiction and land use context. Consult the applicable fire agency for adopted response time standards.

[4] Baseline evacuation time assessment typically requires traffic analysis or evacuation modeling. Where such data is unavailable, this question should be flagged as Requires Further Analysis.

Interpreting Checklist Results

- A **Yes** response to any question related to high or very high wildfire hazard severity zones may, on its own, constitute substantial evidence supporting a potentially significant impact, consistent with CEQA Guidelines and Attorney General (AG) guidance.
- For projects outside high-risk wildfire areas, a pattern of **Yes** responses across multiple categories — particularly those affecting emergency access, evacuation capacity, or vulnerable populations — may indicate potential for a significant impact.
- A **Requires Further Analysis** response indicates that additional project-specific or community-level information may be needed to determine significance.

The determination of significance remains at the discretion of the lead agency, based on the totality of evidence.

Legislative Background

CEQA Requirements for Evacuation

Sections IX and XX of the CEQA Guidelines Appendix G address fire risk and evacuation impacts. Sections IX(f), XX(a), and Guidelines § 15065(a)(4) are directly relevant to evacuation analysis.

> **Section IX — Hazards and Hazardous Materials. Would the project:**
> (f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?
> (g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?
>
> **Section XX — Wildfire. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:**
> (a) Substantially impair an adopted emergency response plan or emergency evacuation plan?
> (b) Due to slope, prevailing winds, or other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
> (c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or result in temporary or ongoing environmental impacts?
> (d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The Guidelines also require addressing whether a project's environmental effects will cause substantial adverse effects on human beings, either directly or indirectly (Guidelines § 15065(a)(4)), which encompasses fire risk and evacuation impacts.

Attorney General Guidance

On October 10, 2022, the California State Attorney General's office published *Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act*, in response to court decisions finding Environmental Impact Reports (EIRs) inadequate due to insufficient analysis of a project's effect on community evacuation capacity. The guidance provides recommendations for complying with CEQA when analyzing and mitigating a project's impacts on wildfire ignition risk, emergency access, and evacuation.

This checklist focuses exclusively on the evacuation and emergency access component. The AG Guidance differentiates the required depth of analysis by project type:

On analysis proportionality: The required analysis is relative to a project's impacts and risks; e.g., a higher density infill project within an already developed area would likely not require the same level of analysis as a new low-density development within the wildland-urban interface and surrounded largely by open space.

On evacuation modeling: For projects located in high wildfire risk areas that present an increased risk of ignition and/or evacuation impacts, evacuation modeling and planning should be considered and developed at the time of project review and approval—when there is greater flexibility to modify a project's design, density, siting, and configuration to address wildfire considerations—rather than deferred to a later stage of the development process.

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