

MEMORANDUM

From: Dudek Fire Protection Planning Team, Michael Huff, Principal
Subject: Passerelle Wildfire Hazard and Evacuation Evaluation, PDS2021-SPA-21-001, PDS2021-GPA-21-003, PDS2021-TM-5338R, PDS2021-STP-21-013, PDS2021-ER-03-02-059C
Date: January 26, 2026
Attachment(s): Figure 1 – Project Location
Figure 2 – Site Plan
Figure 3 – FHSZ
Figure 4 – Fire history
Figure 5 – Fuel Modification Plan
Figure 6 – Regional Evacuation Routes
Figure 7 – Site Evacuation Routes
Figure 8 – Evacuation Zones

This wildfire evaluation provides an assessment of the Passerelle Project's (Project) consistency with applicable fire and building codes, California Environmental Quality Act (CEQA) requirements, and California Attorney General's Office "Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act" along with industry best practices for wildfire and evacuation safety.

1 Passerelle Project

1.1 Project Description

The Passerelle Project is located within the Campus Park Specific Plan approved by the County of San Diego in May 2011 (Approved Project). The Project is proposing to convert a portion of Approved Project that is designated for 157,000 square feet of Office Professional Uses to a 138-unit residential development on an approximately 11.96-acre site within the Fallbrook Community Planning Area of the County of San Diego. The Project site is split into two parcels by Friesian Way, herein referred to as the northern and southern parcels. The northern parcel proposes to develop 35 dwelling unit lots on approximately 2.7 net acres, resulting in a total of 12.9 dwelling units per acre. Entrance to the northern parcel would be provided by a driveway located off Messara Street. The southern parcel proposes 103 residential units on approximately 8.9 gross acres, resulting in a total of 11.5 dwelling units per acre. Primary access to the southern parcel would be provided by a driveway located off Friesian Way with secondary access from Horse Ranch Creek Road.

The residential units for the proposed Project would consist of four distinct floor plans. Plan 1 consists of an approximately 2,250 square foot (sf) residence with three bedrooms and three and a half bathrooms. A total of 24 floor plan 1 units would be constructed, with 5 in the northern parcel, and the remaining 19 in the southern parcel. Floor plan 2 consists of approximately 2,350-sf residence with four bedrooms and three and a half bathrooms. A

total of 30 floor plan 2 units would be constructed, with 6 in the northern parcel, and the remaining 24 in the southern parcel. Floor plan 3 consists of approximately 2,450-sf residence with four bedrooms and three and a half bathrooms. A total of 42 floor plan 3 units would be constructed, with 6 in the northern parcel, and the remaining 36 in the southern parcel. Lastly, Floor plan 4 consists of approximately 2,575-sf residence with four bedrooms and four bathrooms. A total of 42 floor plan 4 units would be constructed, with 18 in the northern parcel, and the remaining 24 in the southern parcel.

Each unit would include a two-car garage, and guests would be permitted to park on the interior project streets in designated, striped, guest parking spaces. The northern parcel would allow for 18 guest parking spaces, and 70 vehicles parked in garages. The southern parcel would allow for 47 guest parking spaces, as well as for 206 vehicles to park in the unit garages. Therefore, the maximum vehicles for the northern parcel would be 88, and the maximum vehicles for the southern parcel would be 253, for a total of 341 vehicles for the Project.

The Project would also include a total of two tot lots, 310 sf and 1,314 sf respectively, and three passive parks areas, including one tot lot and passive park area on the northern parcel and one tot lot and two passive park areas on the southern parcel.

1.1.1 Project Location

The Project is located in the Northeast Quadrant of the SR-76 and I-15 Interchange adjacent to Horse Ranch Creek Road in the Fallbrook Community Planning Area and I-15 Design Review Corridor in unincorporated San Diego County (County), as illustrated in Figure 1, Project Location. The Project site includes approximately 11.96 acres of vacant land located within an unsectioned portion of the Monserate Land Grant, Township 9 South, Range 3 West, on the 2015 Bonsall, California, 7.5-minute U.S. Geological Survey (USGS) quadrangle. The northern parcel of the Project is located on Assessor's Parcel Number (APN) 108-120-62, is comprised of 3.02 acres. The southern parcel is located on APN 108-120-61 and is comprised of 8.94-acres. Both parcels were originally designated for professional office (PO-1 and PO-2) use in the Campus Park Specific Plan.

The northern Parcel is bound to the west by Pankey Road and Horse Ranch Creek Road, to the east by Messara Street and to the south by Friesian Way. The southern parcel is bound to the north by Friesian Way and to the west by Horse Ranch Creek Road.

Local access to the Project site is provided by Horse Ranch Creek Road, Friesian Way and Messara Street. All of the Approved Project's required roadway improvements have been mostly completed except for the improvements associated with the remaining two undeveloped parcels. The existing improvements are adequate to carry all Project traffic and no deficiencies were identified on the surrounding roadways and intersections, as a result of the Project. The Project would not contribute to the need for new or different roadway improvements (Appendix I of the EIR Addendum). Access to the Project's northern parcel would be provided from a single driveway located on Messara Street. Access to the Project's southern parcel would be provided from a driveway located on Friesian Way, and a secondary access driveway from Horse Ranch Creek Road. Additionally, the Project would provide off-site roadway improvements along a portion of Horse Ranch Creek Road, which is within the Project area and previously analyzed in the FEIR for the Approved Project.

1.1.2 Existing Project Site Conditions

The Project site is currently undeveloped land; however, the proposed Project site was mass graded during the construction phase of the surrounding permitted development of the Campus Park Specific Plan. The Project site's topography is relatively flat.

The Project area is served by the North County Fire Protection District. The closest fire station is North County Fire Protection District Station #4 and is located at 4375 Pala Mesa Drive, Fallbrook, CA 92028, approximately 2.5 miles from the Site. The expected emergency travel time to the Project site is approximately 4.9 minutes.

1.1.3 Surrounding Land Uses

The Project site is within the Campus Park Specific Plan, which permitted a 416.1-acre mixed-use planned community that included 751 residences (single family and multi-family), 157,000 sq/ft of office space, 61,200 sq/ft of commercial, neighborhood parks, an active sports park, open space areas and trails, an equestrian/trail staging area, infrastructure to support these uses, and biological preservation. The Project site has been graded as part of the Approved Project's previous construction activities and contains little to no vegetation. Four of the six phases of Campus Park Specific Plan have been constructed as planned, and the Project is one of the remaining few undeveloped parcels.

The Meadowood and Campus Park West projects are two approved and planned adjacent communities that were concurrently planned with the 2011 Campus Park Specific Plan EIR. The Campus Park West Specific Plan, which has not yet been developed, is located south and adjacent to the approved Palomar Community College District Campus, Campus Park and Meadowood projects. The Meadowood Specific Plan area is an approximately 400-acre property located generally between Monserate Mountain and Rosemary Mountain east of the Campus Park and Campus Park West projects. The Meadowood Specific Plan, which proposes the development of up to 886 units (if the proposed school site is not developed), is currently under development.

Further, other surrounding land uses include single-family homes, approximately 710 south of SR-76 and 17 rural estates along Rice Canyon Road, as well as agricultural uses to the east and south, open space to the north, SR-76 to the south, and Pankey Road, Horse Ranch Creek Road, and I-15 to the west.

2 Passerelle Project Area Wildfire Environment

2.1 Fire Hazard Severity Zones

The Project site lies within an area mapped as a Very High Fire Hazard Severity Zone (VHFHSZ), as designated by the North County Fire Protection District (NCFPD) and the California Department of Forestry and Fire Protection (CAL FIRE) (See Figure 3, Fire Hazard Severity Zones). Fire hazard designations are based on topography, vegetation, and weather, amongst other factors. VHFHSZ designation does not indicate that an area is not safe for development. It does indicate that specific fire protection features that minimize structure vulnerability will be required, including Chapter 7A of the California Building Code (CBC) and the California Fire Code (CFC), as amended and adopted by the County.

It is important to note that the Fire Hazard Severity Zone map evaluates “hazard,” not “risk”. The map is like flood zone maps, where lands are described in terms of the probability level of a particular area being inundated by floodwaters, and not specifically prescriptive of impacts. “Hazard” is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as building hardening, recent wildfire, or fuel reduction efforts. “Risk” is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction. High hazard does not result in high risk if the building or community mitigates the hazard.

While the Project site is a designated VFHSZ, it will be required to provide construction enhancements and implement vegetation management strategies, summarized below and described in detail in the Project’s FPP (Athena Consulting 2022), to reduce opportunities for fire to spread from unmaintained fuels into developed areas; therefore, the Project will have significantly lower potential of actual loss than other older communities (such as Palisades and Altadena) and even the older buildings that occur within the Project vicinity.

Development in areas designated VHFHSZ are required to comply with various construction standards including Chapter 49 of the CFC, which requires defensible space in the form of fuel modification zones (FMZs) to be installed around structures, and Chapter 7A of the CBC, and requires exterior construction methods and materials to resist ignition from wildfires. The County of San Diego’s Consolidated Fire Code requires 100-feet of FMZ for all structures over 250 square feet (Athena Consulting 2022).

2.2 Fire History

As demonstrated by Figure 4, Fire History, there have been 54 fires in the vicinity of the Project. The most recent fires were in 2024, including the Garden Fire which burned approximately 50-acres 1.75 miles southwest of the Project site, and the Rice 2 Fire which burned approximately 19.77-acres 1.60 miles east of the Project site. The largest wildfire that has occurred within the 5-mile buffer of the site is the 1969 unnamed fire which burned 19,512-acres. Additionally, the 2007 Rice Fire burned the northern parcel of the Project site, which is the largest fire in the Project vicinity in recent years burning a total of approximately 9,471-acres. Fire History is utilized to generally determine if a Project is likely to be exposed to wildfire. It is likely that the development of the area has led to faster detection and suppression of fires. Continued development, such as the Project, is likely to continue to reduce the probability of the Project being exposed to fire by eliminating available fuel and/or creating more access for Fire suppression crews.¹

2.3 Vegetation/Fuels

The Project area is currently graded and vacant. As described in the Project FPP (Athena Consulting 2022), flammable vegetation is not present on-site due to it previously being mass-graded as part of the larger Campus Park Project. The entire Project site will be developed and landscaped, with landscaping consisting of drought tolerant, irrigated ornamentals. Landscaping species are consistent with the San Diego County Landscape

¹ The California Building Industry Association that provides an analysis of State Fire Marshal property loss data and found that homes built after 2010, “on average, for the nine worst property-loss fires dating back to 2017, only approximately 1% of the homes and apartments destroyed, damaged, or affected were dwellings built after January 1, 2010, even though newer dwellings make up roughly 7% of the state’s total housing stock.” (CBIA 2022)

Ordinance and the Water Efficient Landscape Design Manual. No plants are included that appear on the “Undesirable Plants List” maintained by the County as part of the recommendations for defensible space.

Both the northern and southern parcels are surrounded by existing development, including paved surfaces, residential and commercial structures, and maintained FMZs. Adjacent roadways (e.g., Horse Ranch Creek Road and Friesian Way) would serve as a fuel break that helps to reduce the transmission of fire. The I-15, an eight-lane regional transportation corridor, runs north to south and is a wide paved roadway that similarly provides a fuel break west of the Project site.

2.4 Terrain

The topography of the Project site is predominantly flat, with slight elevation variations between parcels. As described in the Project FPP (Athena Consulting 2022), the northern parcel consists of elevations ranging from 370-375 feet asml in a northerly direction. The southern parcel slopes gently upward from 360-370 feet asml in a northeasterly direction. The project area is currently graded and vacant.

At a community level, the surrounding area to the north is associated with the Monserate Mountain Preserve, which includes approximately 350 acres of preserved land with the majority covered with coastal sage scrub and chaparral, and approximately 5-miles of trails. Further, steep terrain associated with the Pala Mesa County Preserve is to the northeast of the Project site. Topography influences fire risk by affecting fire spread rates. Typically, steep terrain results in faster fire spread up-slope and slower spread down-slope. Terrain that forms a funneling effect, such as chimneys, chutes, or saddles on the landscape can result in especially intense fire behavior. Conversely, flat terrain tends to have little effect on fire spread, resulting in fires that are driven by vegetation and wind.

2.5 Weather

As described in the Project FPP (Athena Consulting 2022), the Project site falls within a semi-arid inland climate with average San Diego precipitation. It is subject to Santa Ana wind events that generally exhibit strong, hot, and dry conditions with very low relative humidity. Although these desert-borne winds may occur at any time of year, they are most likely to occur during the late fall months (September through November). The prevailing summer season wind pattern is from the southwest with winds that are lower in velocity and generally have higher relative humidity. During the summer months, higher velocity winds with lower relative humidity may occur. Winds from other directions (northwest, south and west) may occasionally be gusty and strong; however, these winds are most likely to contain cooler moist air with a higher relative humidity.

2.6 Water Supply

Water Supply for the Project will be required to comply with NCFPD requirements and 2023 SDCCFC for a residential development within a VHFHSZ area (Section 96.1.507.3). As described in the Project’s FPP (Athena Consulting 2022), water service for the Project would be provided by the Rainbow Municipal Water District. As required of all development in VHFHSZ, the Project shall provide enough capacity to meet 2,500 GPM at 20 psi for a 2-hour duration. Specific fire flow requirements for the Project structures will be required to comply with Appendix B of the CFC.

There are nine existing fire hydrants within the vicinity of the Project site, with 11 fire hydrants proposed on-site, three on the northern parcel, and 8 on the southern parcel. Hydrants would be consistent with NCFPD Design Standards and 2023 SDCCFC section 96.1.507.5.7. Water storage and hydrant locations, mains, and water pressures shall fully comply with NCFPD requirements, and structures are required to have fire sprinkles designed in accordance with NFPA 13. The fire hydrants or fire valves shall be between 14 to 24 inches above grade, no closer than 4 feet nor further than 10 feet from the roadway, and 10 feet from combustible vegetation (2023 SDCCFC, Section 507.5.7).

3 Project Comparison with Applicable Wildfire and Building Codes

The Project would be required to comply with applicable portions of the County of San Diego 2023 Consolidated Fire Code (2023 SDCCFC), Ordinance No. 10836; 2024 County of San Diego Fire Protection Guidelines; California Code of Regulations, Title 24; Part 2, 2022 California Building Code (CBC), including Chapter 7A, which is based on the 2021 International Building Code, Part 2.5, 2022 California Residential Code (CRC) Section 337 as adopted by San Diego County, which is based on the 2021 International Residential Code (IRC), and Part 9, 2022 California Fire Code (CFC), including Chapter 49, which is based on 2021 International Fire Code (IFC) or applicable code as adopted and amended by NCFPD and the County of San Diego at the time of construction. Additionally, NCFPD references Fire Standards for informational purposes in clarifying and interpreting provisions of CFC, National Fire Protection Association (NFPA) and California Public Resources Code (PRC).

3.1 Building Codes

The Project would be required to comply with the County Building Code that adopts and amends the 2022 California Building Code (CBC), which is based on the 2021 International Building Code. Specific provisions related to wildfire include Chapter 7A which establishes the minimum standards in VHFHSZ designation areas, for the protection of life and property by increasing the ability of a building to resist the intrusion of flames or burning embers from a vegetation fire and addresses materials and construction methods for reducing exterior wildfire exposure. These measures work to limit the interaction of combustible building materials in a structure with potential wildfire exposure by requiring features such as non-combustible siding, ember resistant vents, and dual pane tempered windows to name a few.

3.2 Fire Codes

The Project would be required to comply with the NCFPD codes and ordinances, and the 2023 San Diego County Consolidated Fire Code. All new structures within the proposed Project would be constructed to NCFPD standards. The County of San Diego 2023 Consolidated Fire Code sets requirements for, among others, access, driveways, premises identification, ongoing fuel modification zone maintenance, ignition resistant construction, and fire protection systems including water supply, fire hydrants, and fire sprinklers. Compliance with applicable fire codes is further described in the project's Fire Protection Plan.

Note: A hose-pull analysis was conducted in accordance with section 503.1.1 of the Adopted Fire Code; all portions of the exterior walls of the first story of each structure are within 150 feet of the approved fire access road.

3.3 Wildfire Specific Requirements

As mentioned previously, the designation of the Project area as a VHFHSZ carries certain requirements to comply with codes and standards that do not apply outside of Fire Hazard Severity Zones. These requirements include construction requirements that affect construction methods and materials of the building, landscaping requirements that affect vegetation on or around the building, and site access.

3.3.1 Ignition Resistant Construction Requirements

Properties built within areas designated as VHFHSZ are required to comply with Chapter 7A of the County Building Code which increases ignition resistance by hardening the structure. For the Project, all habitable structures would be required to comply with a number of requirements that improve ignition resistance and include interior fire sprinklers that would comply with NFPA-13D.

3.3.2 Landscaping Requirements

Properties built within areas designated as VHFHSZ are required to comply with Chapter 49 of the SDCCFC. Furthermore, the project would be maintained in compliance with NCFPD weed, and brush abatement standards that require responsible parties to clear combustible vegetation.

The purpose of FMZs is to remove fuels from the fire pathway thereby starving a potential fire in order to prevent an off-site wildfire from progressing into and endangering the Project. Similarly, the FMZs prevent a potential fire at the Project site from progressing into the wildland. Fuel Modification will be provided around the perimeter of the Project, as required by NCFPD, and will be 100 feet wide or equivalent in all directions through onsite Fuel Modification Zones (FMZ) and Defensible Space of a combination of onsite and offsite FMZ equivalent areas.

The requirements for FMZs as required by NCFPD are as follows:

- **Zone 1 – “Ignition Resistant Zone”**
 - No combustible material within 0-5 feet from the structures
 - This area shall be constructed of continuous hardscape or non-combustible ground covers acceptable to the NCFPD.
 - The use of mulch is prohibited.
- **Zone 2 – “Irrigated Zone”:** It is important to regularly thin and prune vegetation within the first 50 feet of the home.
 - Plant fire-resistant, irrigated landscaping in the first 50 feet of the 100 feet from your structure. These plants need to be maintained all year around.
 - Properly irrigating plants will help prevent plants from igniting. Wildfire rarely occurs until after June, because as little as 1 inch of water per month keeps drought adapted plants from readily burning. Permanent irrigation should be confined to landscaping within the first 50 feet of a structure.
- **Zone 3 – “Thinning Zone”:** Create spacing between vegetation to slow potential spread.
 - Keep natural vegetation in the remaining 50 feet of the 100 foot space. This would be the area furthest away from your structure. The plants need to be thinned and cut back to no more than 6 inches above the ground.

- **For Both Zones (A & B):**
 - Stack firewood at least 30 feet away from all structures and fences.
 - Keep 10 feet of clearance around propane or butane tanks.
 - Trim off any dead tree limbs.
 - Remove debris and pine needles from under trees and inside of rain gutters.
 - Stagger plants, shrubs, and trees in order to reduce the chance of fire spreading.
 - Clear the property of any unnecessary fuel like garbage, trimmings, and other flammable waste.
 - Ensure the property address is visibly posted and at the end of the driveway so that it can be easily located in the event of an emergency.

As applied to the Project, Figure 5 – Fuel Modification Plan displays the fuel management zones for the project, as well as identifies existing fuel modification activities.

4 Wildfire Evacuation Analysis

Analysis relating to a Project’s impact on Wildfire Evacuation are guided by the relevant questions in CEQA Appendix G including:

- Does the Project substantially impair an adopted emergency response plan or emergency evacuation plan? (Appendix G Section XX)
- Does the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (Appendix G Section IX)

Before discussing this analysis, it is important to note that most agencies do not have a designated quantitative threshold for evacuation, such as “evacuations should only take X minutes”. Instead, an evacuation is considered to be safe if evacuees can evacuate before a wildfire threatens their structures and evacuation roadways. Simply, the amount of time required to evacuate the Project should be less than the time available to evacuate. The available time is increased by providing alternate routes, protecting the roadways, and hardening the structures. A major component of this evaluation must be the vulnerability of the structure and roadways to wildfire, so that credit is given or debited against a project that hardens structures and roadways, or fails to harden structures or roadways respectively. While this section focuses on the various factors affecting available and required evacuation time, it is contextualized by the actual wildfire environment and the susceptibility of structures and roadways to becoming impaired by wildfire.

4.1 Evacuation Procedures

The County of San Diego has various operational documents that aid emergency managers with carrying out an evacuation, including in the unincorporated community of Fallbrook. Some of these documents include the 2022 San Diego County Emergency Operations Plan (EOP), the 2022 San Diego County EOP Evacuation Annex (Annex Q), the 2023 San Diego County Multi-Jurisdictional Hazard Mitigation Plan, and the 2022 Fallbrook Fire Safe Council Community Wildfire Protection Plan. While these resources guide agency actions during an evacuation, there is also material available for residents to educate themselves on how to respond to an evacuation. NCFPD, and other fire

agencies throughout the county, and state, implements the Ready, Set, Go program that instructs occupants how to prepare their home for wildfire and to leave immediately when a wildfire evacuation order is issued.

These aforementioned documents work together to instruct occupants how to prepare and respond to evacuation orders while also guiding the responding agencies on how to carry out complex evacuations. The 2022 San Diego County EOP has various functional annexes relevant to evacuation including Annex Q Evacuation, and Annex L Emergency Public Information that demonstrates careful forethought for carrying out various types of evacuations. Should an evacuation impact the Project area, the emergency response agencies would be prepared to carry out various strategies such as phased evacuations to move occupants that are more imminently threatened prior to occupants that are not imminently threatened, traffic control to manually direct evacuees quickly and effectively and deploy signs and security to prevent unauthorized traffic movement.

The San Diego County Sheriff's Office (SDSO) is the primary agency responsible for conducting evacuations within contract cities jurisdictions and the unincorporated San Diego County, which includes the Project site. If necessary, Unified Command will assess and evaluate the need for evacuations with cooperating agencies, and SDSO or local law enforcement orders and conducts evacuations according to established procedures, which are outlined in the County's EOP Evacuation annex. Other departments with resources to support the evacuation may be called to serve in secondary support roles as the situation deems necessary.

Among the methods available to citizens for emergency information are radio, television, social media/internet, neighborhood patrol car, aerial public address notifications, and Reverse 911 or AlertSanDiego. The County utilizes AlertSanDiego for its Community Emergency Notification System. AlertSanDiego is a regional notification system that sends telephone notifications to occupants and businesses within areas in the County impacted by, or in danger of being impacted by, an emergency or disaster. AlertSanDiego allows SDSO and the San Diego County Office of Emergency Services (OES) to initiate voice messages, text messages and e-mails to the public based on their geographic location. Examples of emergency notifications include evacuation notices, shelter-in-place notices and imminent threats to life or property. Additional information on emergency notifications as well as the criteria for sending an AlertSanDiego alert is listed in the 2022 San Diego County EOP, Annex L: Emergency Public Information.

AlertSanDiego has accessibility features for people with disabilities and others with access and functional needs. Accessible AlertSanDiego is a service that helps people in San Diego County who are deaf, blind, hard of hearing, or deaf/blind get emergency information. Residents can receive emergency messages on devices like computers, cell phones, tablets, and special devices that help people who are blind or have low vision (like Braille readers). These messages are shown in American Sign Language (ASL) videos, and there's also English voice and text with them.

Unlike AlertSanDiego which requires residents to register, Wireless Emergency Alerts (WEA) are emergency notifications from local, state, or federal officials that are broadcast to cell phones in a targeted area. WEA messages alert residents about the emergency, what actions residents should take, and how they can find out more information. WEA messages are limited to 90 characters, so residents are urged to follow up on the alerts by turning to local media and/or officials for additional details.

In addition, the San Diego Emergency Alert System (EAS) is county-wide and broadcasts emergency information via multiple radio stations including KOGO 600 AM and KLSD 1360 AM, and on the following local television stations: 7/39 KNSD (NBC), 8 KFMB (CBS), 10 KGTV (ABC), 6 XETV (Fox).

When the SDSO implements an evacuation order, they will coordinate with the Incident Commander (IC) or the Emergency Operations Center (EOC) to decide on a location to use as a Temporary Evacuation Point (TEP). American Red Cross (ARC), along with the OA EOC's Care and Shelter Branch will coordinate the locations to be used as emergency shelters if necessary. The OA EOC staff may assist, as requested, in the coordination of an evacuation in an incorporated city. The SDSO Dispatch Center in conjunction with the OA EOC and Joint Information Center will utilize the AlertSanDiego system, social media, radio, television, Wireless Emergency Alerts, and Integrated Public Alert and Warning System (IPAWS), etc. to direct evacuees to the established TEP or shelter.

TEPs will serve as temporary safe zones for evacuees, but they generally do not provide any services, such as food, water, restrooms, etc. Emergency shelters are opened when at least one overnight stay is necessary. Basic services are provided at emergency shelters, which include meals, accessible shower facilities, dormitory management, health, and behavioral health services. Some TEPs may be suitable to be converted into an emergency shelter location, if necessary and available. Possible shelters and assembly areas that can provide at least short-term refuge and that would be designated by emergency managers during an evacuation include public schools and recreation centers. Presently, large graded areas are present adjacent to the sports recreation fields, which offer the potential to be utilized as emergency apparatus staging areas dependent upon environmental conditions.

The 2022 Fallbrook Fire Safe Council Community Wildfire Protection Plan notes multiple temporary refuge areas that Fallbrook and surrounding communities could be directed to in the event of a wildfire. The list of temporary evacuation points included the Fallbrook Campus of Palomar College, which is located at 35090 Horse Ranch Creek Road, approximately .5-mile from the intersection of Horse Ranch Creek Road and Friesian Way, the intersection separating the northern and southern parcels of the Project site.

4.2 Project Vicinity Evacuation

4.2.1 Evacuating Population

Communities are divided into evacuation zones to geographically designate neighborhoods and communities that may experience a simultaneous threat. By doing this, emergency managers are able to implement phased evacuation to move occupants in areas facing imminent danger prior to moving those in areas that are not directly threatened. The Evacuation zones are identified in Figure 7, and the Project is situated in zone SDC-0149 for the northern parcel, and SDC-0148 for the southern parcel of the Project. In the case of a wildfire that threatens the Project area, the surrounding zones may also be included in an evacuation depending on the movement of the wildfire. The most likely zones to be evacuated simultaneous to the Project's evacuation zones are SCD-0150 and SDC-151.

For conservative planning purposes it is customary to identify the worst-case scenario and thereby expose potential weaknesses. The worst time and most conservative analysis for an evacuation would be a weeknight when all residents of the Project and the surrounding communities are at home, and all occupants of the area would need to evacuate.

Utilizing the evacuation zones identified above, the total number of residential units within the study area have been identified using adopted specific plans for Campus Park, Campus Park West and Meadowood Specific Plans and Google Earth images to identify existing residential development, the total number residential units is approximately 2,785 residential units, refer to Table 1, Residential Uses and Estimated Population by Area.

Table 1. Residential Uses and Estimated Population by Area

Development	Total Dwelling Units	Estimated Population
Campus Park	751	2,156
Meadowood	886	2,543
Campus Park West	283	813
South of SR-76	710	2,038
Rice Canyon Estates	17	49
Sub-Total Existing	2,647	7,599
Project	138	397
Total	2,785	7,996

Sources: County of San Diego 2009, County of San Diego 2014, County of San Diego 2024

Census data provides the average persons per household for the Fallbrook Community Plan Area, which is approximately 2.87 persons per household (SANDAG 2024). The total population in the study area with the Project would be approximately 7,996 occupants. Census data also provides the average vehicles per household in this area, approximately 2.00 vehicles per household (US Census Bureau 2023). While it is more likely that Project occupants residing in the same household would share a vehicle to evacuate, for conservative planning a factor of 2.00 is utilized. This results in 5,570 evacuating vehicles from residences in the Project area.

4.2.2 Evacuation Routes

The Project site includes the two parcels that have not yet been developed within the existing Campus Park Specific Plan area; therefore, except for the internal Project roadways and proposed improvements to Horse Creek Ranch Road along the Project frontage, existing circulation infrastructure within the Campus Park Specific Plan area is fully constructed. Additionally, all roadways within the study area (Table 1), including for the Project, will have 10 feet of fuel modification and well maintained, irrigated, drought-tolerant landscapes that support safe evacuations, reducing opportunities for fire to encroach on evacuating vehicles. The following describes the roadways that would be used by Project traffic during an evacuation of the Project site.

Messara Street: A two-lane road that provides primary access to the northern parcel.

Friesian Way: A two-lane road that provides primary access to the southern parcel.

Horse Ranch Creek Road: The primary evacuation route for the Project, approximately 1.60 miles between SR-76 and Friesian Way. The configuration of Horse Ranch Creek Road varies:

- Three-lane road (2NB/1SB) between SR-76 and Pankey Place, approximately 1,250 feet
- Four-lane road (2NB/2SB) between Pankey Place and Andalusian Trail, approximately 4,075 feet
- Two-lane road (1NB/1SB) between Andalusian Trail and Gold Palomino Way, approximately 1,340 feet

- Four-lane road² (2NB/2SB) between Gold Palomino Way and Friesian Way, approximately 1,725 feet

Pankey Road: A two-lane road that provides an alternative northerly evacuation route, Horse Ranch Creek Road transitions to Pankey Road north of Friesian Way.

4.2.3 Evacuation Time Analysis

To access SR-76 and I-15, it is assumed that all evacuation traffic within the Campus Park Specific Plan, including from the Project site, Campus Park West Specific Plan and Meadowood Specific Plan will use Horse Ranch Creek Road as the primary evacuation route to access SR-76 and I-15. Under the existing condition, there are approximately 5,294 evacuating vehicles and 5,570 evacuating vehicles with the Project. Under the existing condition, of the estimate 5,294 evacuating vehicles within the study area, approximately 3,564 would be evacuated via Horse Ranch Creek Road. Under existing with Project conditions, of the estimate 5,570 evacuating vehicles within the study area, approximately 3,840 would be evacuated via Horse Ranch Creek Road. As described above, the configuration of Horse Ranch Creek Road varies; therefore, to remain conservative and to capture effects associated with the narrowing of Horse Ranch Creek Road between Andalusian Trail and Gold Palomino Way and Pankey Place and SR-76, a conservative hourly capacity of 1,700 vehicles per hour³ is applied across the entirety of the 1.60 miles of Horse Ranch Creek Road between Friesian Way and SR-76. Under these conservative assumptions, the total estimated evacuation time is approximately 2 hours and 06 minutes without the Project and approximately 2 hours 16 minutes with the Project. Therefore, it is estimated that the Project would increase evacuation times approximately 10 minutes along Horse Ranch Creek Road.

Evacuation routes in the area provide access to SR-76, approximately 1.60 miles south of the Project site, and I-15, approximately .94 miles west along SR-76, which aid in quickly moving occupants from the area. For reference, a basic freeway segment is expected to move approximately 2,250 vehicles per hour per lane at free flow speeds of 55 mph (both freeways have posted speed limits of 55 mph in this area)⁴. I-15 in this area has 4 mainline lanes in each direction, and SR-76 has 2 mainline lanes in each direction. It is mostly likely that traffic would be directed west toward Oceanside, along SR-76, which has an average hourly capacity of 1,700 vehicles per lane per hour for a two-lane highway⁵, therefore, SR-76 could accommodate approximately 3,400 vehicles per hour if evacuees are split evenly amongst all lanes under free flow conditions. Additionally, evacuating traffic could also move south on I-15 toward Escondido, resulting in an additional 4 lanes at 2,250 vehicles per hour per lane, or approximately 9,000 vehicles per hour. Therefore, when considering the vehicles utilizing both the SR-76 to travel west, and the I-15 to travel south, the roadway capacity would be 12,400 vehicles per hour if evacuees are split evenly amongst all lanes under free flow conditions.

However, it must be noted that other existing roadway geometrics or traffic conditions (e.g., rush hour traffic, visibility, terrain, etc.) would influence the capacity of these freeway segments. For example, data recorded in the Caltrans Performance Measurement System (PeMS) database indicates that the average afternoon rush hour speed (4:00 p.m. to 5:00 p.m.) on Interstate 15, northbound, at postmile 56.7 (near SR-76) is 25 mph. the opposite

² With proposed project improvements.

³ National Academies of Sciences, Engineering, and Medicine. 2022. *Highway Capacity Manual 7th Edition: A Guide for Multimodal Mobility Analysis*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/26432>.

⁴ National Academies of Sciences, Engineering, and Medicine. 2022. *Highway Capacity Manual 7th Edition: A Guide for Multimodal Mobility Analysis*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/26432>.

⁵ Hourly roadway capacities were estimated using a 1,700 vehicles per hour per lane (vphpl) capacity per the Highway Capacity Manual [HCM] 7th Edition, Chapter 15 - Two-Lane Highways, and the SANDAG ABM2/2019 RTP 2025 data to obtain roadway classifications.

direction at the same location, average morning rush hour speed (6:00 a.m. to 7:00 a.m.) is 43 mph. I-15 northbound peak hour traffic volumes are around 1,500 vehicles per lane (6,000 total), while the I-15 southbound peak hour traffic volumes are around 1,400 per lane (5,600 total). SR-76, in both directions, does not experience a slowdown during peak hours as PeMS data show that average speeds throughout the day are around 67 mph in both directions. Peak hour traffic volumes for SR-76 are 850 vehicles per lane, well below the hourly capacity of 1,700 vehicles.

While rush-hour could impact evacuation, it is also expected that roadways would be shut down by Law Enforcement to allow for evacuation if necessary, providing the full roadway capacity to evacuees. Because of the vast connectivity of the freeways, evacuees can be considered safe when they get to the freeways, if not sooner as explained below. The limiting factor would be the roads that connect occupants to the freeways, which have much smaller capacities, however traffic control as explained in the various emergency planning documents would greatly aid hastening evacuations.

4.2.4 Passerelle Project Evacuation and Impact to Existing Land Uses

With the proposed 138 residential units, the Project is estimated to add up to 341 evacuating vehicles to the existing area. Expressed as a percentage change, the Project adds 5.2% more vehicles to the evacuating area when considering all households. The Project has multiple points of connection for Project occupants to access the existing roadway network extending to SR-76 and I-15 including via the driveways on Messara Street, Friesian Way, and Horse Ranch Creek Road.

As discussed in the wildfire sections of this technical memo, heat and flame from wildfire is not expected to directly impact the site, however embers could impact the site. Considering the location of the Project site, on the interior of the Campus Park and surrounding developments, completely separated from potential wildfire exposure and highly unlikely to be evacuated. Additionally, given the distance required to evacuate and the protection afforded by the code requirements for development in areas designated VHFHSZ, shelter-in-place would likely be the preferred option for Project occupants, and occupants of surrounding communities (i.e., Meadowood, Campus Park West). Further, the Project will have an ongoing Homeowner's Association that would be required to complete ongoing maintenance and irrigation that does not lead the vegetation to support combustion. By building to Chapter 7A of the SDC Building Code, the Project site would be resistant to ignition by embers. Should individuals self-select for evacuation, meaning they leave prior to an evacuation order, they would be considered safe as soon as they reach Grid Road evacuating west along SR-76 or Lawrence Welk Resort along I-15 South. Based on fire history, it is likely that fire would be originating from the north and/or east and evacuating traffic would travel south and west.

As described above, the Project has multiple contingency options, including sheltering-in-place that would likely be preferred for occupants of the Project and adjacent communities due to the distance to the nearest safe zones. P.A.C.E. evacuation planning is based on a military concept focused on mitigating risk by developing a strong primary plan along with three contingency plans. P.A.C.E. stands for Primary, Alternate, Contingency, and Emergency. If the Primary plan is compromised, the Alternate plan would be activated. If the Alternate plan is considered not functional or not safe, the Contingency plan is implemented. If the Contingency plan does not mitigate the risk, then the Emergency plan is activated. P.A.C.E. evacuation planning is a simple and effective tool used to accomplish evacuations with flexibility and redundant contingencies.

Table 2 PACE Evacuation Plan for the Passerelle Project

Contingency	Project Approach
Primary	If ample time is available, the Project will evacuate via the primary evacuation route(s) after receiving evacuation notice utilizing the primary evacuation route(s) as directed by law enforcement/emergency managers. The Project specific primary evacuation route is Horse Ranch Creek Road, connecting occupants to SR-76, and I-15 to travel towards Escondido and Oceanside. Depending on the location of the fire or hazard requiring evacuation, evacuees could also travel north on I-15 N to Temecula or east on SR-76 to Pala Casino.
Alternate	Project will follow evacuation instructions which may include an alternate plan for a phased evacuation based on congested traffic conditions. Notifications that this alternate plan is being implemented will be provided via the notification systems or on-site emergency personnel, media and social media. For the Project, an alternative plan may include using a secondary evacuation route, such as Pankey Road, north to Stewart Canyon Road, then north or south along Old Hwy 395.
Contingency	If an evacuation is no longer the safest option, the contingency plan could direct evacuees to parking lots, internal project roadways, or other open space areas that provide temporary safety. Alternatively, the contingency plan of evacuating all residents could be halted in favor of evacuating smaller, highest vulnerability populations, such as senior residents. For the Project, this may include evacuating until direction is provided to cease evacuation and initiate on-site sheltering of a smaller portion of residents on-site. Occupants may be instructed to remain in protected on-site structures or at a designated site while firefighters perform their structure protection function.
Emergency	When the wildfire or other emergency dictates that off-site evacuation is not advised, due to primary, alternate, and the contingency options being compromised or undesirable, and conditions are such that open air exposure would be unhealthy or unsafe, residents will not be directed to begin evacuating but will be directed to shelter in place. Sheltering in place is possible due to the ignition resistant construction materials and irrigated landscape that creates a fire hardened development. Sheltering in place may also be the preferred option for other emergencies, e.g., an earthquake. People who shelter in place are advised to remain aware of the situation and move out of the building to a designated safe zone if directed to do so or otherwise necessitated.

Targeted evacuation, which typically limits the scope of the evacuation to only the area in immediate danger and placing a larger area on standby for evacuation, has replaced mass evacuation as the standard protocol for conducting evacuations. This practice allows for better evacuation operations, reduces gridlock, and reserves sufficient travel methods for emergency vehicles. Mass evacuation scenarios where large populations are all directed to leave simultaneously, resulting in traffic delays, are thereby avoided, and those populations most at risk are safely evacuated.

As stated in the County EOP, when public safety officials determine that evacuation is not feasible, temporary refuge and/or sheltering on site may be the best option. Residents may be encouraged and allowed to stay in their homes while firefighters perform their structure protection function if it is considered unsafe to evacuate. This procedure is consistent with San Diego County Operational Area Emergency Operations Plan evacuation approach and is recommended if there is little time for the public to react to an incident, or when it is safer for the public to stay

indoors for a short time rather than travel outdoors. Sheltering-in-place can reduce congestion and transportation demand on the major transportation routes being utilized as evacuation routes.

4.3 Potential Evacuation Impact Assessment

Neither CEQA, nor the County has adopted numerical time standards for determining whether an evacuation timeframe is appropriate. Public safety, not time, is generally the guiding consideration for evaluating impacts related to emergency evacuation. As outlined in Appendix G of the CEQA Guidelines, the County considers a Project's impact on evacuation significant if the Project will significantly impair or physically interfere with implementation of an adopted emergency response or evacuation plan; or if the Project will expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

The County of San Diego has historically had an extremely high success rate for safely evacuating large numbers of people and doing so in a managed and strategic way using available technological innovations. Evacuation issues could result from limited evacuation routes, existing non-conforming narrow evacuation routes, exposures along evacuation routes, lack of temporary refuge areas, and vulnerable community buildings. None of these potential issues are prevalent at the Project which would have multiple evacuation routes with code-compliant road widths, limited exposure to open space along evacuation routes, temporary refuge areas, and ignition resistant buildings.

Technological advancements and improved evacuation strategies learned from prior wildfire evacuation events have resulted in a system that is many times more capable of managing evacuations. The San Diego County EOP provides a framework for responding to all emergency types and allow for flexibility to address the unique situations that may arise during an incident through use of modern technology to communicate evacuation alerts to specific evacuation areas. With the technology in use today in the County such as smart phones and emergency alerting, evacuations are more strategic and surgical than in the past, evacuating smaller areas which are at the highest risk and phasing evacuation traffic so that it flows more evenly and minimizes the surges that may slow an evacuation. Mass evacuation scenarios where large populations are all directed to leave simultaneously, resulting in traffic delays, are thereby avoided, and those populations most at risk populations can safely evacuate. This technology also allows emergency managers to recognize structures such as the Project that can be used to shelter would-be evacuees, provide temporary refuge, and thereby keep streets clear for evacuees of areas and structures that are susceptible to loss from a wildfire.

As evidenced by the minor increase of 5% more vehicles evacuating the area with the addition of the Project, evacuation traffic generated by the Project would increase the overall evacuation travel time by approximately 10 minutes. Further, the Project converts undeveloped land into non-combustible structures and maintained landscape, thereby increasing the availability of areas of refuge for evacuees that would not exist without the Project while reducing wildfire exposure along Horse Ranch Creek Road. The Project does not preclude local jurisdictions or emergency personnel conducting evacuations, nor would the Project cut off or otherwise modify any of the County or the community of Fallbrook's evacuation routes as identified in the Fallbrook Fire Safe Council Community Wildfire Protection Plan's Evacuation Map.

In any area, safely undertaking large-scale evacuations may take several hours or more and require moving people long distances to designated areas. Further, evacuations are fluid, and timeframes may vary widely depending on numerous factors, including, among other things, the number of vehicles evacuating, the road capacity to accommodate those vehicles, residents' awareness and preparedness, evacuation messaging and direction, and

on-site law enforcement control. The "Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act" guidance from the California Office of the Attorney General suggests that jurisdictions set benchmarks of significance based on past successful evacuations or on those from communities in similar situations. Safely undertaking large-scale evacuations is a complicated process that involves many factors that cannot necessarily be determined in advance. A large-scale evacuation may take several hours or more and require moving people long distances to designated areas.

Due to its location, the Project would also provide the responding emergency managers (e.g., incident commander, San Diego Sheriffs Office) the alternative option of recommending that all or a portion of the onsite population shelter in place due to construction type, ignition resistance, and defensible space zones. This on-site sheltering option is a contingency plan identified in the Evacuation Annex, but an important option in the scenario when evacuation is considered infeasible or the less safe option. This would provide emergency managers with a safer alternative to risking a late evacuation.

Overall, as presented in this assessment, safe evacuation of the Project and surrounding community is possible in evaluated scenarios and would not be expected to expose people or structures to a significant risk of loss, injury or death. Also, because the Project site is a large area of ignition resistant, urbanized landscapes surrounding the immediate Project site, it is not anticipated that the entire community would be relocated off-site during a wildfire event. Further, like any new, large community or urbanized area, the Project will provide numerous opportunities throughout the site for on-site relocation and sheltering in place as a contingency option to evacuation off-site.

5 California Environmental Quality Act

CEQA is a disclosure law, meaning it requires the Lead Agency (the County) to evaluate various components of the Project and determine the impacts. A project is not necessarily barred from approval for having impacts but is in violation if it fails to disclose and thereby subject to litigation. As related to Wildfire, there are 5 relevant questions that are required to be evaluated for Projects in a VHFHSZ such as the Project:

- *Does the Project substantially impair an adopted emergency response plan or emergency evacuation plan?*
The Project would not impact an adopted emergency response plan or emergency evacuation plan. The project does not block or re-route existing roadways/evacuation routes or propose actions or approaches that are conflicting with local Emergency Operations or Response Plans.
- *Due to Slope, Prevailing Winds, and Other Factors, Would the Project Exacerbate Wildfire Risks and Expose Project Occupants to Pollutant Concentrations from a Wildfire or the Uncontrolled Spread of a Wildfire?*
The wildfire environment in the area was observed to be moderate given the open space that is north, south and east of the Project site that could spread wildfire in the vicinity of the Project site. However, separation from the Project to these wildland fuels is significant and removes the potential for direct exposure. Additionally, it is possible that a wildfire occurring in the open space within the vicinity of the Project, when winds are blowing toward the Project could result in smokey conditions. However, the type of buildings proposed would enable residents to remain indoors and not subject to smoke. Spread of wildfire from the Project site would be limited as a result of compliance with building and fire codes for development in a VHFHSZ.
- *Would the Modified Project 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 that May Result In Temporary or Ongoing Impacts to the Environment?* The Project would not result

in the installation of new infrastructure beyond its footprint. The Project would convert an area to a fire hardened site with irrigated landscapes, maintenance, pavement and concrete and ignition resistant buildings. The result of this conversion of ignitable fuels to ignition resistant land uses is a net decrease in potential ignitions and virtual elimination of vegetation related fires.

- *Would the Modified Project 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 Project site itself is relatively flat, and based on the Project's location and surrounding terrain, and distance from the nearest steeper slope areas, there is virtually no potential exposure of the Project to significant risks from flooding, landslides, runoff, or post-fire slope instability or drainage changes. Necessary engineered infrastructure considers proper site drainage and stability.
- *Would the Project Expose People or Structures Either Directly or Indirectly, to a Significant Risk of Loss, Injury, or Death Involving Wildland Fire?* Within the Project Vicinity, there are fuels and vegetation types that could spread wildfire. However, the Project is largely removed from fuels with the Meadowood community to the east and SR-76 to the west. Additionally, the Project provides ignition resistant buildings, landscapes, and is surrounded by fuel modification equivalent ground covers which eliminate wildfire occurrence in all directions for distances well beyond the standard 100 feet requirement. Further, the Project site would not be vulnerable to ember ignitions as a result of compliance with Chapter 7A of the SDC CBC and meeting/exceeding FMZ requirements. The same features that prevent an off-site fire from progressing to the Project and endangering Project occupants also prevent a potential Project related fire from spreading off-site by eliminating the chain of fuels otherwise known as a fire pathway. The Project would not exacerbate off-site wildfire risk.

The impacts for each of these questions can be no impact, less than significant impact, less than significant impact with mitigation incorporated, potentially significant impact. Dudek's opinion is that for each of the CEQA questions, the Project's potential impact is: Less than Significant Impact.

5.1 California Attorney General's Office Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act

In October of 2022, AG Rob Bonta published a guidance document to assist local agencies to design development projects in a way that minimizes impacts to wildfire ignition, emergency access, and evacuation, and protect California's residents and the environment. The guidance expanded the scope of the CEQA section by asking lead agencies to evaluate the wildfire criteria for all projects located on or near wildfire prone areas, not just those that were in VHFHSZs as the CEQA appendix states. The guidance document makes it clear that the AG's office feels that "residential developments in the wildland-urban interface and other wildfire prone areas can significantly increase the risks of wildfires and the related risk to public safety. Introducing more people via additional development increases the likelihood of fire ignition, which may then develop into a wildfire. Building housing in the wildland-urban interface also puts more people in harm's way and may hinder evacuation routes and emergency access⁶.

⁶ <https://oag.ca.gov/news/press-releases/attorney-general-bonta-issues-guidance-local-governments-mitigate-wildfire-risk>

While certain human activities result in sparks, flames, or heat that may ignite vegetative fuels without proper prevention measures in place, these ignitions predominantly occur as accidents; however, may also be purposeful, such as in the case of arson. Roadways are a particularly high source for wildfire ignitions due to high usage and vehicle-caused fires (e.g., catalytic converter failure, overheated brakes, dragging chains, tossed cigarettes, etc.). However, there is no evidence supporting the AG's opinion that a master planned community with the designed, implemented, and maintained protections results in increased ignitions. For example, common vegetation ignition sources like distribution power lines and vehicles are addressed through undergrounding power lines and providing roadside fuel modification. Structural fires are prevented through ignition-resistant materials and interior sprinkler systems. Other human-caused ignitions do not spread through the carefully selected and maintained landscapes and FMZ buffers. Ignitions that may occur are controlled quickly by nearby fire stations. The removal of dense flammable native vegetation and replacement with ignition-resistant landscapes in master planned developments, like Campus Park, is not associated with increased vegetation ignitions. Most fires are initiated from equipment, followed closely by power lines, and are therefore more likely to occur close to roads and structures. Also housing density directly influences susceptibility to fire because in higher density developments, there is one interface (the community perimeter) with the wildlands. In lower density development, there is more structural exposure.

Additionally, Alexandra D. Syphard, a fire expert who has studied fire conditions in San Diego County, has consistently maintained that higher-density developments built with ignition-resistant building materials and defensible space requirements, fare much better because defensible space reduces the flame length and spread of fire and ignition resistant construction limits ember intrusion and increases the time it takes for a structure to catch fire. These measures also significantly improve the ability of structures (and people) to survive wildfires.

The Project would not significantly increase fire hazards because the Project incorporated into its design, the measures identified in the FPP, including the additional fire protection systems, fuel modification and vegetation management. These features render the Project defensible and more able to withstand fire. Therefore, the Project would not significantly increase fire hazards.

As discovered in this initial review and based off of experience, the level of impact for this Project would likely be less than significant due to the performance of the codes and standards that the Project would be required to comply with including non-combustible construction type, compliant limited landscaping, Chapter 7A compliant features. Other local features that impact the Project and aid in reducing the risk of wildfire include the adjacent land uses that provide a level of protection greater than that required in code by completely removing fuels as evidenced in the surrounding paved roadways, and surrounding structures.

6 Conclusions

In conclusion, Dudek's analysis results in the following findings classified in the following order: evacuation and CEQA.

6.1 Evacuation Analysis

To summarize Section 2 and 4 of this technical memorandum, the Project proposes a Specific Plan Amendment to designate 11.96 acres (the northern and southern parcels discussed herein) within the 416-acre Approved Project site for the development of 138 multi-family residential units designed as single-family homes on lots rather than the development of 157,000 sf of professional offices uses. This area is presently served by a sufficient

transportation network with multiple nearby major transportation corridors, including SR-76 and I-15, that are unlikely to be overwhelmed by the addition of 5% more vehicles. The roadway network can work in tandem with the community of Fallbrook's and the County's emergency planning for maximum efficiency of each roadway to systematically move people out of the area, should evacuation be deemed necessary. The Project does not cut-off or otherwise negatively impact any of Fallbrook's or the County's evacuation routes. Rather, it converts open space with the potential to transmit fire into hardened structures and maintained landscaping, thereby reducing potential wildfire exposure to occupants of existing land uses that would be evacuating along Horse Ranch Creek Road and I-15. The Project has layered fire protection features such as noncombustible construction, compliance with Chapter 7A of the SDC Building Code, compliance with Chapter 49 of the SDCCFC, and very limited exposure to wildfire, essentially only possibly being exposed to embers. The Project does not offer available fuel for embers, so a spot fire is unlikely to occur. As such, the Project may not need to be evacuated or could be evacuated later, allowing nearby residential and commercial areas with less protective features to be evacuated first.

6.2 CEQA Analysis

Based off of the assumptions analyzed in this technical memo, it is unlikely that the Project creates significant impacts under any of the CEQA thresholds due to the inherent safety of complying with modern fire and building codes as well as the limited exposure to wildfire, and the evacuation contingency options offered to emergency management professionals.

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SOURCE: Esri World Imagery; Open Street Map 2023

FIGURE 1
Project Location
 Campus Park Project

1) NORTH PARCEL

AC	2.7
UNITS	35
DU/AC	12.9

Parking Summary

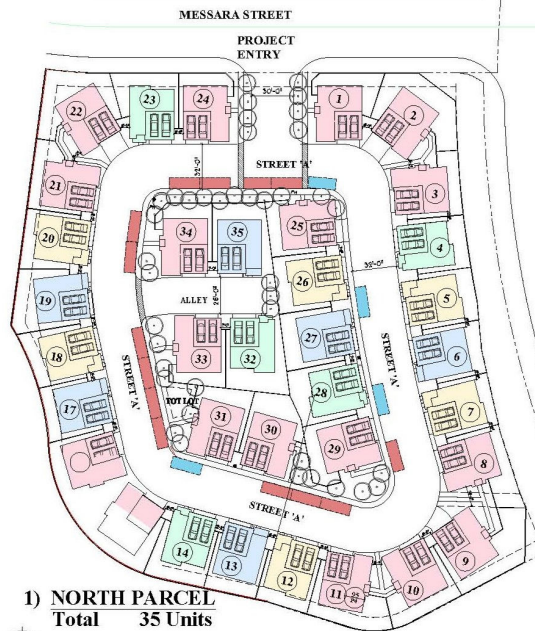
Unit		
Required	2 per unit	
Provided	2 in garage	
Guest		
Required	.2 /unit or 7	
Provided	.5 /unit or 18	
EV Device	one in each garage	
Bike Sto	in garage	
Bike Rack	located at Tot Lot	
HC Parking	one space	

2) SOUTH PARCEL

AC	8.9
UNITS	103
DU/AC	11.5

Parking Summary

Unit		
Required	2 per unit	
Provided	2 in garage	
Guest		
Required	.2 /unit or 20.6	
Provided	.4 /unit or 47	
EV Device	one in each garage	
Bike Sto	in garage	
Bike Rack	one space	
HC Parking	one space	



1) NORTH PARCEL
Total 35 Units



2) SOUTH PARCEL
Total 103 Units

PARKING EXHIBIT 1-1
SITE DEVELOPMENT PLAN

Site Plotting @ CS-6 SCALE: 1" = 40'-0"

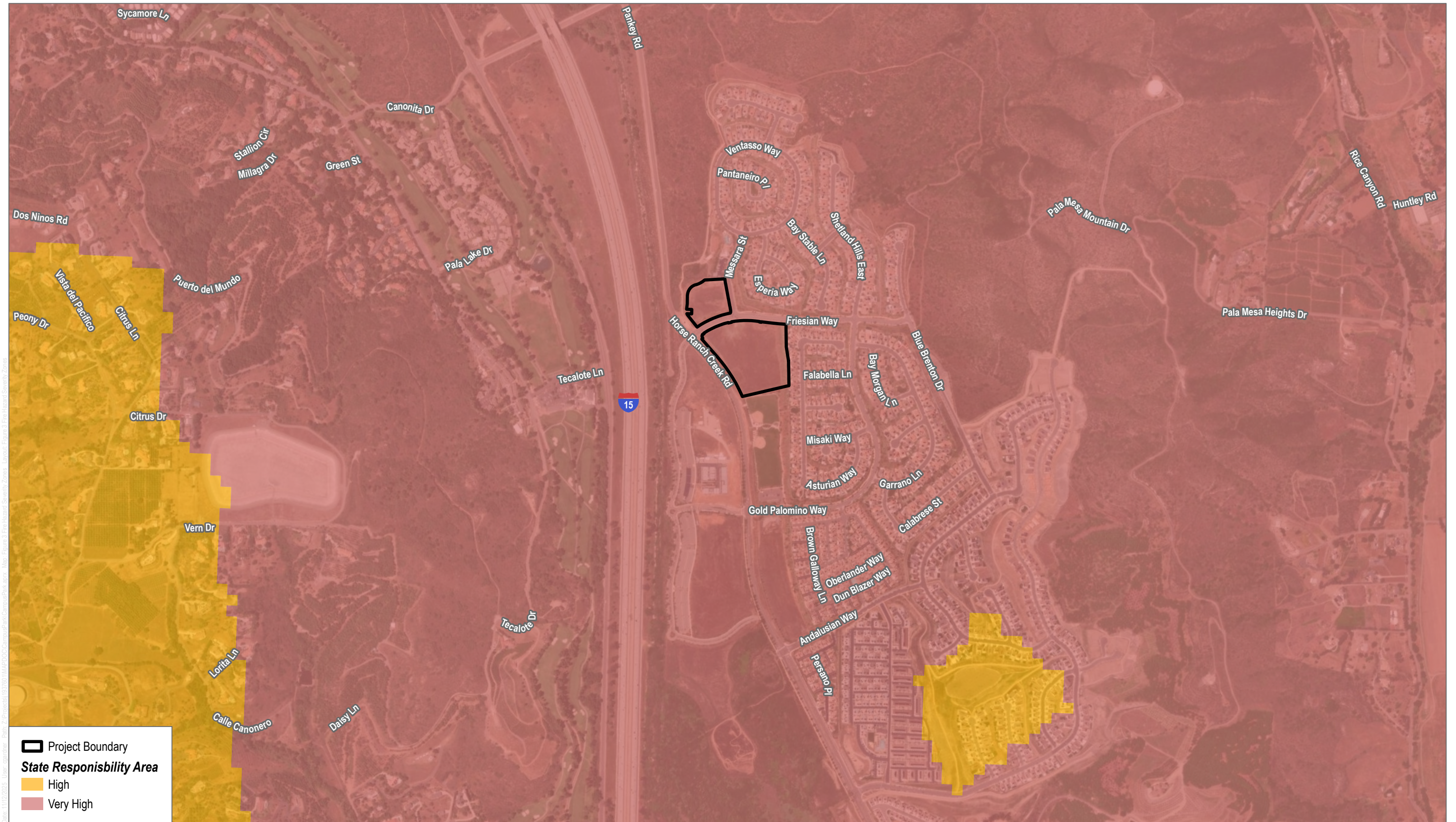
LEGEND		
	PLAN 1	24 UNITS
	PLAN 2	30 units
	PLAN 3	42 units
	PLAN 4	42 units
	TOTAL	138 units

SITE DATA:	
AC	11.6
UNITS	138
DU/AC	11.8

SOURCE: Bucilla Group Architecture, Inc (10/22/25)

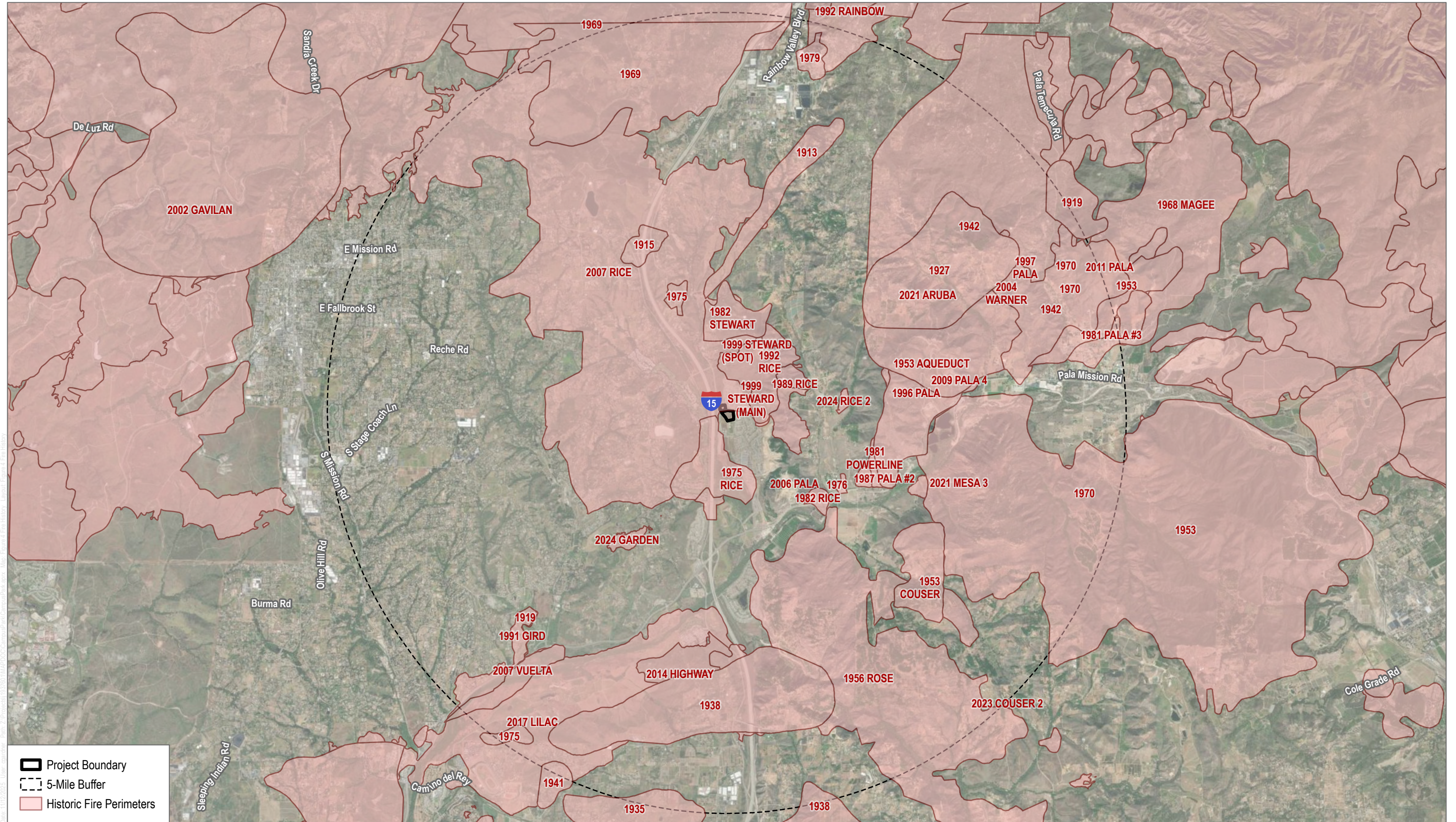


FIGURE 2
Site Plan
Campus Park Project

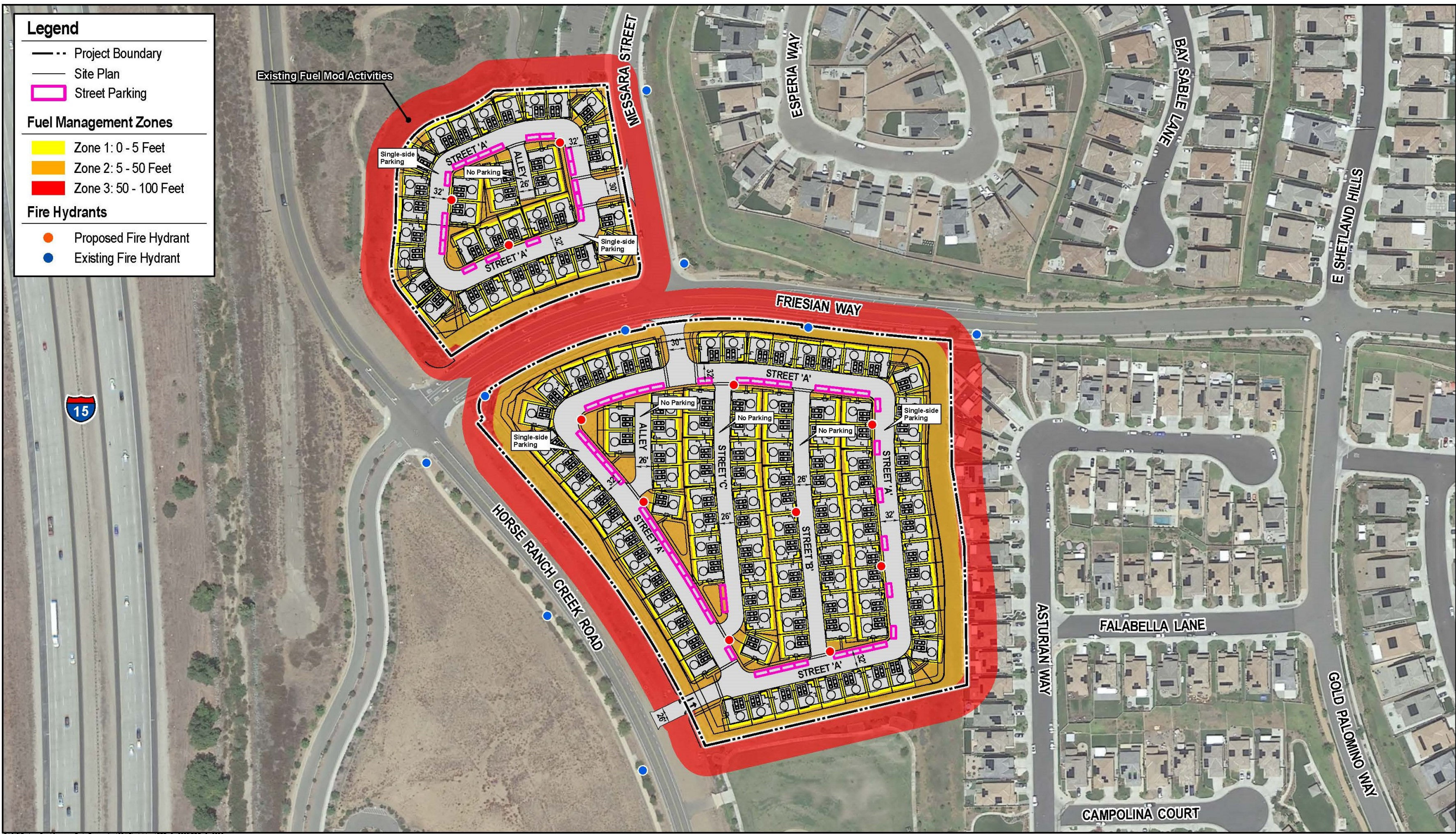


SOURCE: Maxar 2024; CalFire 2025

FIGURE 3
CAL FIRE Fire Hazard Severity Zones
 Campus Park Project



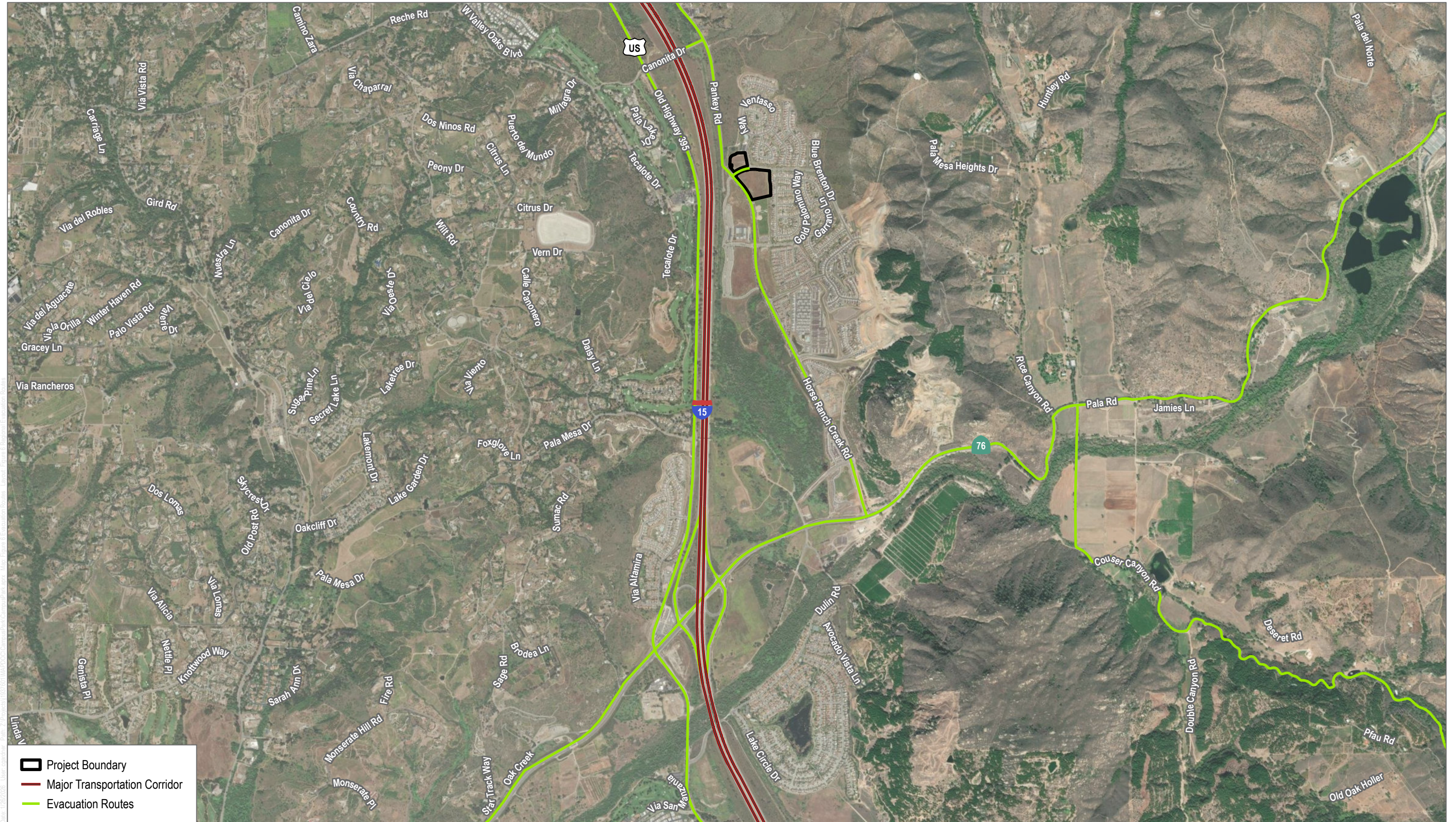
SOURCE: Maxar 2024; Open Street Maps 2019; CalFire 2025



D:\GIS\Project_Data\Campus_Park_Passera\1604\Final_Maps\F-FP_Oct2022\F-FP_Oct2022.aprx

SOURCE: Athena Consulting

FIGURE 5
Fuel Modification Plan
 Campus Park Project



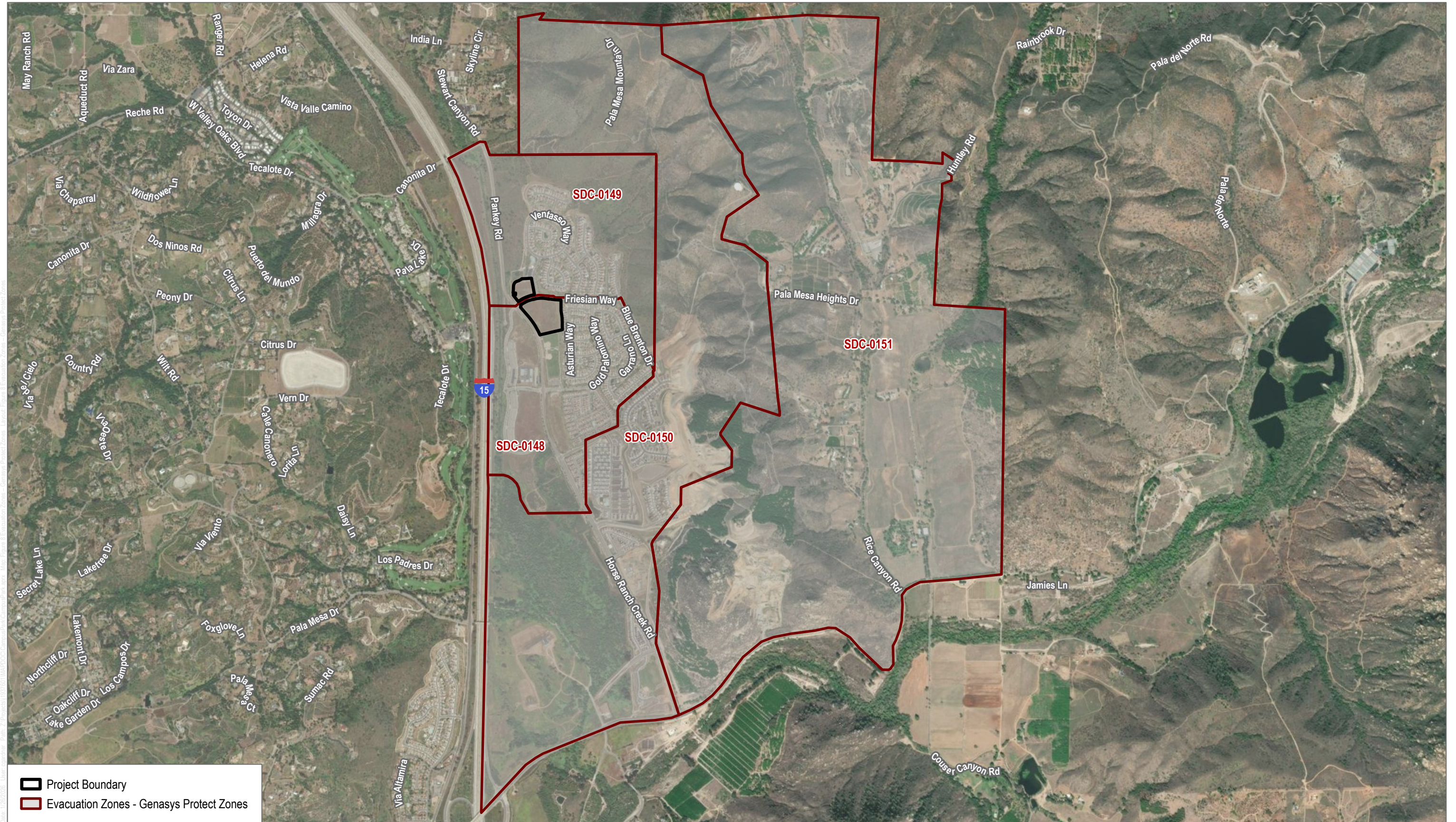
SOURCE: Esri World Imagery; Open Street Map 2019; SANGIS 2024

FIGURE 6
Regional Evacuation Routes
Campus Park Project



SOURCE: Esri World Imagery; Open Street Map 2019; SANGIS 2024

FIGURE 7
Site Evacuation Routes
 Campus Park Project



SOURCE: Esri World Imagery; Open Street Map 2019; Genasys Project 2025

FIGURE 8
Evacuation Zones – Genasys Protect Zones
Campus Park Project