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Council considers 6th Cycle Housing Element Environmental Impact Report, focuses on evacuation routes

By Lou Fancher

As part of the 6th Cycle Housing Element - which outlines potential development of the Regional Housing Needs Allocation of 2,114 units assigned to Lafayette, including a buffer bringing the total to 3,095 units - the Lafayette City Council is required to certify a final draft Environmental Impact Report to provide an in-depth analysis required by the California Environmental Quality Act (CEQA) and address the impact of development projects under policies in the Housing Element.

At its Aug. 8 city council meeting Lafayette Senior Planner Renata Robles, who was joined by housing consultant Diana Elrod, Luke Evans of ESA, and Ellen Poling, a traffic consultant with Fehr & Peers, presented to council members an update and review of the draft EIR.

The studies conducted include items such as evaluating and providing metrics for a project's impact on air quality, aesthetics, evacuation routes, direct wildfire significance, and other aspects. Questions focused on evacuation routes in very high fire hazard severity zones and concerns about "significant or insignificant" impacts during emergencies.

The following three scenarios were chosen for analysis in the EIR based on the likelihood of occurrence, location in high fire risk areas, availability of evacuation routes, and the judgment of the emergency responder representatives: Wildfire originating in the north (Briones Regional Park) and moving southeast - afternoon, August/September with schools in session; Wildfire originating in the eastern portion of the Lafayette Reservoir area and moving east - afternoon, August/September with schools in session; and Wildfire originating in southeast Lafayette (Hunsaker Canyon Road) and moving north - nighttime, August/September.

According to the report, the assumptions used as part of the analysis were conservative, and included, among other things, that an entire region of the city would be required to evacuate at the same time (e.g., under Scenario 1, all areas north of SR-24 would be required to evacuate simultaneously), which is unlikely given that evacuations are more typically implemented by notifying specific subareas or zones as an emergency event unfolds (sometimes called a "rolling" evacuation).

Council members Susan Candell, Wei-Tai Kwok and Gina Dawson brought up aspects about evacuations and language used to reference them in the draft EIR. Information in the report specifically states the evacuation routes used in the AB 747 analysis were those identified in the City's Emergency Operations Plan/Wildland Fire Evacuation Plan and are listed in Table 4.17-2 of the Draft EIR.

According to the draft EIR, ". if the HEU is adopted and if subsequent residential development occurs, conditions in the city would change, and the city's evacuation plans would need to be updated to reflect those changed conditions. This is not just good policy, it is also a requirement of State law, specifically AB 747."

The analysis showed that full development under either the HEU with Distributed Sites or the Downtown-Only Alternative would increase evacuation times for certain areas of the city. Some areas would experience no increase at all, but other areas would experience some level of increase, ranging from just a few minutes to nearly an hour. The city concluded that the estimated increase in evacuation times under various conservative assumptions may warrant changes to the plan, which is already updated on an as-needed basis, but would not substantially impair emergency response or evacuation enough to warrant special action or the elimination of a site from consideration.

Importantly, Robles and the consultants reiterated a primary difficulty in assessing and determining the importance of impacts: There are no established numerical standards or thresholds for when the amount of time needed to evacuate an area is excessive.

Evans said identifying what is significant, and what is not, is difficult to evaluate and subject to differing opinions without metrics to guide them. CEQA thresholds depend on actual (complete) impairment, such as would make an evacuation impossible. Using checklist questions provided by CEQA, he said it remains impossible to determine what would actually prevent an evacuation, although it is possible to determine the delay metrics.

At the end of the discussion, the council asked the staff and consultants to look into whether changes in language that might include applying "significant and unavoidable" to impacts or other changes resulting from re-examination of Zonehaven designations could be added without causing the report to be rejected by HCD. Candell also questioned whether anyone had direct conversations with County Connection regarding buses performing evacuation services during an emergency, and asked the consultants to return with that information for further discussion at the Sept. 12 council meeting.

The complete draft and final EIR can be found at www.lovelafayette.org/CEQA.

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