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MEMORANDUM

From:	Dudek Fire Protection Planning Team, Michael Huff, Principal
Subject:	2535 Midway Drive Post Point Project – Hazard and Evacuation Evaluation (PRJ-1124273)
Date:	August 7, 2026
Attachment(s):	Figure 1 – Project Location Figure 2 – Proposed Site Plan Figure 3 – Fire Hazard Severity Zones Figure 4 – Fire History Map Figure 5 – Evacuation Routes Figure 6 – Evacuation Zones – Genasys Protect Zones Figure 7 – Geologic and Seismic Hazard Zones Map Figure 8 – Tsunami Hazard Map Figure 9 – Flood Zone Map

The following provides an assessment of the potential hazards that could impact the Midway-Pacific Highway Community Plan, the Project site, and the surrounding evacuation roadway network. This evaluation also considers how the Project, a Community Plan Amendment and Rezone of the Project parcels, would impact evacuation as compared to the currently approved land uses and zoning.

1 Post Point Project

1.1 Project Description

The Project site is located in the Midway-Pacific Highway Community Plan Area, in the City of San Diego, on three decommissioned parcels of the United States Post Office Distribution Center, at 2535 Midway Drive (Figure 1, Project Location). The 16.05-acre site is split into three areas, Area A, Area B, and Area C.

The Project does not propose development at this time, rather, the Project proposes a Community Plan Amendment and Rezone that would modify the land use designation and rezone the Project parcels. The land use on the site is currently designated as Business Park – Residential Permitted (Mixed-Use; 0-44 du/acre) and would be redesignated to Residential-High (45-73 du/acre) and rezoned from Commercial Office (CO-3-1) to Residential Multiple-Unit (RM-3-9). Areas A and B contain two recently constructed residential communities, while the third area, Area C, is currently vacant following the demolition of the US Post Office Distribution Center (Figure 2, Proposed Site Plan).

The current designation as CO-3-1 allows for the residential development of the completed Area A and Area B with a previously recorded deed restriction on Area C to meet the required commercial use square footage to comply

with the zoning. Therefore, all areas are proposed to be evaluated and rezoned together to ensure the current and future uses would comply with the designation for use. The rezone would allow for the development of an additional 466 units of housing on site, while reducing the amount of potential commercial uses.

1.1.1 Existing Project Site Conditions

A portion of the Project site is currently vacant; formerly developed and utilized as a USPS Distribution Center. The Project site's topography is relatively flat. The approximately 16.05-acre site is divided into three areas, Area A, Area B, and Area C, as shown on Figure 2, Proposed Site Plan. Area A contains the 405 dwelling unit Bevel Apartment community located at 3250 Barnett Drive on approximately 7.12 acres with Assessor's Parcel Numbers (APNs) of 450-480-015 and 450-480-016. Area B contains the 253 dwelling unit Bowen Apartment community located at 3280 Barnett Drive on approximately 4.47 acres with an APN of 450-480-017. Area C is vacant and located at 2535 Midway Drive on 4.46 acres with an APN of 450-480-013. Vegetation on site is limited to plantings and spaces associated with the Bevel and Bowen apartment complexes constructed on Area A and Area B. There is no vegetation present on Area C, all onsite trees and shrubbery were removed during the demolition process of the US Post Office Distribution Center, leaving Area C to be strictly pavement and the foundation of the previous structure.

The Project area is served by the San Diego Fire-Rescue Department (SDFD) and the San Diego Police Department (SDPD). The closest fire station is San Diego Fire Station No. 20, at 3305 Kemper Street, San Diego, CA 92110, approximately 1.1 miles northwest of the site. Fire Station No. 20 is staffed with Engine 20, Truck 20, and Medic 20. Fire-rescue response time estimates for 3250 Barnett Avenue were calculated using the 911 Computer Aided Dispatch (CAD) System point-to-point routing, which identifies the closest travel path along the roadway network from the responding fire station to the incident location. Response times include dispatch and turnout time. Engine 20 and Truck 20 responding from Fire Station 20 are each estimated to reach the Project entrance in approximately 3.9 minutes. Additional response support is available from nearby stations, including Engine 8 from Fire Station 8 (approximately 4.6 minutes), Engine 3 from Fire Station 3 (approximately 5.1 minutes), and Engine 2 from Fire Station 2 (approximately 5.4 minutes). These response times indicate that Fire Station 20 provides the fastest initial response, with additional resources available shortly thereafter.

Police service for the Post Point Project in the City of San Diego will be provided by officers from Western Division, located at 5215 Gaines Street, San Diego, CA 92110, approximately 2 miles northwest of the site.

1.1.2 Project Location

The Project is in the western portion of the Midway-Pacific Highway Community Planning Area, in the City of San Diego (City). The project site is generally bounded by Midway Drive to the northeast, Barnett Avenue to the south, and residential development to the west. The Project site encompasses a total of approximately 16.05 acres of land, divided among three parcels (7.12 acres, 4.47 acres, and 4.46 acres), located within Section 33, Township 16 South, Range 3 West, on the San Bernardino Meridian, in San Diego, California. The Project proposes to rezone the entire site, including all three areas, from CO-3-1 to RM-3-9. Local access to the Project site is provided by Barnett Avenue and Midway Drive.

1.1.3 Surrounding Land Uses

The subject site is surrounded by a range of community-serving and institutional land uses. The properties adjacent to the Project site are retail shopping centers and the Navy Regional Plant Equipment Office to the north, military-

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restricted multi-family residential development to the west, a neighborhood retail shopping center to the east, and the San Diego Marine Corps Recruit Depot to the south. Further, other surrounding land uses include single-family homes, the San Diego International Airport to the south, Liberty Station to the southwest with limited office spaces, retail, restaurants, galleries, event spaces, and schools. North of the site includes retail and commercial land uses, as well as the I-5 and I-8 interchange, and east of the site includes the Naval Information Warfare Systems Command (NAVWAR) along Pacific Highway and I-5.

2 Project Area Hazard Environment

The City's Local Hazard Mitigation Plan (LHMP) identifies wildfire/structure fire, flood, drought, extreme heat, and earthquake as the top five hazards that could impact the city. Of these, fire, flood, and earthquake events pose the most likely risk to the site from an evacuation perspective, and therefore warrant a detailed evaluation in this report. While extreme heat and drought are recognized as critical hazards due to their potential to affect public health and water supply, they are not anticipated to result in direct structural damage or necessitate large-scale evacuations, therefore extreme heat and drought are not discussed further herein. In addition to the LHMP-identified hazards, tsunami has been considered given the Project site's proximity to the San Diego Bay and areas identified as potential tsunami flood inundation zones.

2.1 Fire Risk

2.1.1 Fire Hazard Severity Zones

The Project site is not mapped as within a Fire Hazard Severity Zone (FHSZ) under the 2025 Local Responsibility Area FHSZ Maps effective August 30, 2025, as adopted by the San Diego Fire-Rescue Department (SDFD) and the California Department of Forestry and Fire Protection (CAL FIRE) (see Figure 3, Fire Hazard Severity Zones). A portion of the Midway-Pacific Highway community planning area northwest of the project site and Rosecrans Street is mapped within a Very High Fire Hazard Severity Zone. Unlike other areas of the City, San Diego County, and throughout southern California where wildfire hazards are designated as moderate, high, or very high fire FHSZs due to topography, vegetation, and weather conditions, the site is not considered subject to such risks due to the flat topography, and limited vegetation due to the development on and adjacent to the site. As a result, the Project is not expected to experience wildfire hazards comparable to those in designated FHSZs. Nevertheless, all development would be required to comply with applicable fire protection requirements, including the California Building Code (CBC) and California Fire Code (CFC), as amended and adopted by the city, to ensure structures are constructed with features that minimize vulnerability to fire.

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.

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While the Project site is not located within a designated FHSZ, all development on the site will be required to implement and comply with all applicable codes summarized below in Section 3 of this memorandum. 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). Modern code requirements have significantly lowered the potential of actual loss due to fire when compared to older communities (such as Palisades and Altadena) and even the older buildings that occur within the Project vicinity that are not constructed to current codes.

2.1.2 Fire History

As demonstrated by Figure 4, Fire History, there have been two fires that burned within five miles of the Project site. The most recent fire was the 1985 Lehr Fire, which burned 155.2-acres approximately 4.4 miles east of the site, south of I-8, and between I-805 and I-15. The other wildfire that has occurred within the Project vicinity is the 1935 unnamed fire which burned 3,678.8-acres approximately 3.1 miles north of the Project site. Fire history is used to help assess the likelihood of a project being exposed to wildfire. No recorded fire has burned onto the Project site, likely due to the extent of surrounding development in the area which has led to faster detection and suppression of fires. Continued development in the vicinity is likely to continue to reduce the probability of the Project being exposed to wildfire or vegetation fire.

2.1.3 Vegetation/Fuels

Flammable vegetation is not present on-site due to previous site improvements associated with the decommissioned United States Post Office distribution center and Area A and Area B of the Post Point project Development. Area C has been cleared to pavement, with all onsite trees and shrubbery removed. The entire Site will be developed and maintained. No development is proposed at this time, however future development landscaping would consist of drought tolerant, irrigated ornamentals. No plants that appear on the "Undesirable Plants List" maintained by the County as part of the recommendations for defensible space should be planted on site.

Areas A, B, and C are surrounded by existing development, including paved surfaces, roadways, and residential and commercial structures. Adjacent roadways such as Barnett Avenue, Midway Drive, Rosecrans Street, Pacific highway, and I-5 would help to limit the potential spread of the fire. Barnett Avenue a four-lane roadway, runs east to west and is a wide paved roadway that similarly provides a fuel break from the vegetation south of Barnett Avenue to the Project site.

2.1.4 Terrain

Terrain can play a role in the spread of wildfire; fire spread is facilitated uphill due to convective heating from rising byproducts of combustion. The topography of the Project site is predominantly flat. The project area was previously graded and developed. Areas A and B of the site have been redeveloped, and Area C of the site is vacant. At a community level, the surrounding area is developed with retail, commercial, residential land uses, with paved parking lots *and* roadways that are also relatively flat.

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2.1.5 Weather

San Diego and the project area are influenced by the Pacific Ocean and are frequently under the influence of a seasonal, migratory subtropical high-pressure cell known as the "Pacific High." Wet winters and dry summers, with mild seasonal changes, characterize the Southern California climate. This climate pattern is occasionally interrupted by extreme periods of hot weather, winter storms, or dry, easterly Santa Ana winds. The average high temperature for the San Diego area is approximately 70°F, with average highs in the summer and early fall months (July–October) reaching 77°F. The average precipitation for the area is approximately 9.7 inches per year, with the majority of rainfall concentrated in the months of November to April, while smaller amounts of rain are experienced during the other months of the year.[1]

The Project site falls within a semi-arid 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.

2.2 Structure Fire

A structural fire hazard is one where there is a risk of a fire ignition within or on the outside of a building and which may spread uncontrollably from one building to another across several city blocks, or within hi-rise buildings.

The City of San Diego Annex to the 2023 Multi-Jurisdictional Hazard Mitigation Plan notes wildfire and structure fires as a priority hazard with an overall significance ranking as medium, with a limited geographic area that could be affected, due to development removing and maintaining fuels, the maximum extent as weak, and the probability of future fires events as likely. (City of San Diego, 2023). The project site is surrounded by developed land and paved roadways that would not spread a fire if one ignited. Additionally, all structures on site would be built to current codes with modern fire safety features that would meet the SDFD requirements, further preventing a fire from spreading and allowing for a structure fire to be quickly managed. New development would also be required to meet applicable fire-flow and water-supply standards intended to provide firefighters with adequate water for structural fire suppression. Together with the Project's proximity to Fire Station 20, approximately 1.1 miles from the site, these factors would reduce the risk of large-scale fire spread and support timely emergency response, recognizing that response conditions may vary based on incident-specific factors.

2.2.1 Water Supply

Water Supply for the Project will be required to comply with the City's current municipal code and SDFD requirements at the time of construction. At the time this memorandum was drafted The City of San Diego has proposed local amendments to the Municipal Code to implement the 2025 California Fire Code (CFC) and California

[1] All weather data sourced from Weather Spark. 2025. https://weatherspark.com/y/1816/Average-Weather-in-San-Diego-California-United-States-Year-Round

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Wildland-Urban Interface Code (CWUIC) which became effective January 1, 2026. The City's Fire Code Regulations are incorporated in the San Diego Municipal Code Chapter 5, Article 11, Division 1-83.

Water service for the Project would be provided by the San Diego Public Utilities Department. Specific fire flow requirements for the Project structures will be required to comply with the local amendments to Appendix B of the CFC. Water storage and hydrant locations, mains, and water pressures shall fully comply with SDFD requirements.

2.3 Earthquake

An earthquake is a sudden motion or trembling that is caused by a release of strain accumulated within or along the edge of the Earth's tectonic plates. The effects of an earthquake can be felt far beyond the site of its occurrence. They usually occur without warning and, after just a few seconds, can cause massive damage and extensive casualties. Common effects of earthquakes are ground motion and shaking, surface fault ruptures, and ground failure. Ground motion is the vibration or shaking of the ground during an earthquake. When a fault ruptures, seismic waves radiate, causing the ground to vibrate. The severity of the vibration increases with the amount of energy released and decreases with distance from the causative fault or epicenter. Soft soils can further amplify ground motions. The severity of these effects is dependent on the amount of energy released from the fault or epicenter.

One widely used tool that describes earthquake intensity is the Richter scale. The Richter scale was devised as a means of rating earthquake strength and is an indirect measure of seismic energy released. The scale is logarithmic with each one-point increase corresponding to a 10-fold increase in the amplitude of the seismic shock waves generated by the earthquake. In terms of actual energy released, however, each one-point increase on the Richter scale corresponds to about a 32-fold increase in energy released. Therefore, a magnitude (M) 7 earthquake is 100 times (10 x 10) more powerful than an M5 earthquake and releases 1,024 times (32 x 32) the energy.

Liquefaction is the phenomenon that occurs when ground shaking causes loose soils to lose strength and act like viscous fluid. Liquefaction causes two types of ground failure: lateral spread and loss of bearing strength. Lateral spreads develop on gentle slopes and entails the sidelong movement of large masses of soil as an underlying layer liquefies. Loss of bearing strength results when the soil supporting structures liquefies and causes structures to collapse. The CPU PEIR identifies liquefaction and slope instability as a primary geological hazard within the Midway Pacific Highway CPU area. The Project site is flat and previously developed and is not subject to slope instability. While the site is located in an area with potential for liquefaction, any future development would be required to complete site specific geotechnical investigations in accordance with Chapter 14, Article 5, Division 18 of the San Diego Municipal Code and City of San Diego Development Services Information Bulletin 515. These investigations would identify and incorporate appropriate design and construction measures to address liquefaction hazards.

San Diego County has several major active faults including the Rose Canyon, La Nacion, Elsinore, and Coronado Bank Fault zones. The Rose Canyon Fault Zone, as shown on Figure 7, Geologic and Seismic Hazard Zones Map, is the nearest zone to the project site, extending inland from La Jolla Cove, south through Rose Canyon, along the east side of Mission Bay, and out into San Diego Bay, and is considered to be the greatest potential threat to the region due to the proximity to high populated areas (City of San Diego, 2023). The City of San Diego Annex to the 2023 Multi-Jurisdictional Hazard Mitigation Plan notes the significance ranking of the earthquake hazard as medium, with an

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extensive geographic area that could be affected, the maximum extent as severe, and the probability of future earthquake events as occasional (City of San Diego, 2023).

2.4 Tsunami

A tsunami is a series of long waves generated in the ocean by a sudden displacement of a large volume of water. Underwater earthquakes, landslides, volcanic eruptions, meteoric impacts, or onshore slope failures can cause this displacement. Tsunami waves can travel at speeds averaging 450–600 miles per hour. As a tsunami nears the coastline, its speed diminishes, its wavelength decreases, and its height increases greatly. After a major earthquake or other tsunami-inducing activity occurs, a tsunami could reach the shore within a few minutes. One coastal community may experience no damaging waves while another may experience very destructive waves. Some low-lying areas could experience severe inland inundation of water and deposition of debris more than 3,000 feet inland.

The City of San Diego Annex to the 2023 Multi-Jurisdictional Hazard Mitigation Plan notes the overall significance ranking of the tsunami hazard to the city as low, and the probability of tsunami events as unlikely (City of San Diego, 2023). Additionally, as depicted on Figure 8, Tsunami Hazard Map, the Project site is not displayed within the tsunami inundation zone. Therefore, occupants of the Project site are not expected to be evacuated in the event of a tsunami, although other nearby communities nearby including south of Harbor Drive would be. Occupants of the Project site staying in place during a tsunami warning would allow for the capacity of the pre-determined tsunami evacuation routes to be reserved for those who are in the potential tsunami flood areas.

2.5 Flood

A flood occurs when excess water from rainfall, or storm surge accumulates and overflows onto a river's bank or to adjacent floodplains. Floodplains are lowlands adjacent to rivers, lakes, and oceans that are subject to recurring floods. Most injury and death from floods occur when people are swept away by flood currents, and property damage typically occurs as a result of inundation by sediment-filled water.

Several factors determine the severity of floods, including rainfall intensity and duration. A large amount of rainfall over a short time span can result in flash flood conditions. A sudden thunderstorm or heavy rain, dam failure, or sudden spills can cause flash flooding. The National Weather Service's definition of a flash flood is a flood occurring in a watershed where the time of travel of the peak of flow from one end of the watershed to the other is less than six hours. The central and eastern portions of San Diego County are most susceptible to flash floods due to terrain including the presence of mountain canyons, dry creek beds, and high deserts (City of San Diego, 2023).

Dam failures can also result in severe flood events. When a dam fails, a large quantity of water is suddenly released with a great potential to cause human casualties, economic loss, lifeline disruption, and environmental damage. Dam failure is usually the result of age, poor design, or structural damage caused by a major event such as an earthquake or flood. There are no dams in the vicinity of the Project that would impact the site or cause for an evacuation of the occupants[2].

The City of San Diego Annex to the 2023 Multi-Jurisdictional Hazard Mitigation Plan notes the significance ranking of the flood hazard as medium, with a limited extent of a geographic area that could be affected, the maximum extent as being moderate, and the probability of future flood events as likely (City of San Diego, 2023). As displayed in Figure

[2] https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2

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9, Flood Zone Map, the Project site is not expected to be subject to flooding, or evacuated from the site, as a result of rainfall or from a dam failure.

3 Evacuation Procedures

The City and County of San Diego have various operational documents that aid emergency managers with carrying out an evacuation, including in the vicinity of the Project. Some of these documents include the City of San Diego Emergency Operations plan (EOP), the 2022 San Diego County Operational Area (OA) EOP, the 2022 San Diego County EOP Evacuation Annex (Annex Q), the 2023 Multi-Jurisdictional Hazard Mitigation Plan, which includes the City of San Diego Annex. 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. SDFD, and other fire agencies throughout the county, and state, implements the "Ready, Set, Go Program"[3] 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 City of San Diego Police Department (SDPD) is the primary agency responsible for conducting evacuations within City limits, which includes the Project site. If necessary, Unified Command will assess and evaluate the need for evacuations with cooperating agencies (San Diego County Sheriff Department, Highway Patrol, CALTRANS), and will conduct evacuations according to established procedures, which are outlined in the City's EOP. 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 City of San Diego adopted the county-wide notification system to assist in the safe evacuation of area residents and businesses. 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,

[3] https://www.sandiego.gov/fire/community-outreach/safety-tips/ready-set-go

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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: CityTV on Channel 24(Cox/Spectrum) or on Channel 99 (AT&T).

When the SDPD 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). 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.

3.1 Project Evacuation

3.1.1 Evacuation Routes

As a result of the level of development in the area, multiple routes are available for use during an emergency evacuation. The following section identifies the primary roadways anticipated for Project traffic during an evacuation of the Project site; however, it does not include all local streets that may be utilized. Actual evacuation routes will be determined based on event-specific conditions and may involve law enforcement directing traffic.

Lytton Street / Barnett Avenue: A Four-lane roadway (2EB/2WB) with segments of a striped centerline or raised median that is located along the southern frontage of the site and provides access between Rosecrans Street and Pacific Highway.

Midway Drive: A Four-lane with a Center-Left Turn Lane roadway (2NB/2SB) that provides primary access along the northern frontage of the site and provides access between Rosecrans Street and Barnett Avenue.

Pacific Highway: A north-south running roadway located to the east of the project site that provides an alternative evacuation route. The configuration of Pacific Highway varies between the I-5 and the Downtown Community located south of the project site. Immediately to the east of the Project site, Pacific Highway is a two-lane roadway in each direction, then widens to three lanes in each direction before constricting back down to two lanes per direction

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south of the San Diego International Airport. This variation in lane configuration and divider type result in varying capacities and roadway widths for its various segments.

Rosecrans Street: A six-lane roadway located to the north of the project site with segments that include either a striped centerline or a raised median that provides access between Midway Drive and Lytton Street to Camino Del Rio West and I-5 north and I-8 east.

Camino Del Rio West: A six-lane roadway located north of the site that provides access between Rosecrans Street and the adjacent freeway network.

Interstate-5 (I-5) and Interstate-8 (I-8): The major transportation corridors that occupants of the Project site could utilize during an evacuation from the immediate area. I–5 serves as a primary north–south corridor through San Diego, connecting the region to Orange County and Los Angeles to the north and the U.S.–Mexico border to the south. I–8 runs east–west, linking coastal San Diego to inland communities and continuing toward Imperial County and Arizona. Together, these freeways provide essential regional connectivity and serve as primary routes for large-scale emergency evacuations.

To access major and regional transportation corridors, it is assumed that evacuation traffic within the Midway-Pacific Highway Community Plan area, including from the Project site, will use Lytton Street/Barnett Avenue and Midway Drive as the primary evacuation route to access Pacific Highway, and Rosecrans Street to Camino Del Rio West to I-8, and I-5.

3.1.2 Most Intense and Most Impactful Development Considerations

For the sake of evacuation, the most intense and impactful development would be a development that would be estimated to generate the greatest number of on-site vehicles at a given time that would need to evacuate the site. It is important to note that the worst-case possible land uses for evacuation are not guaranteed to be the worst-case possible land uses for other disciplines' evaluations. To estimate the greatest number of vehicles associated with the residential and non-residential land uses for both zoning scenarios, census-based assumptions and industry -standard parking generation rates were utilized. Residential vehicle estimates were calculated using an average of 2 vehicles per dwelling unit[4]. For commercial and office land uses, vehicle generation was estimated using the minimum parking requirements established in the San Diego Municipal Code (SDMC) for development within a Transit Area Overlay Zone. The Project site is also located within a Transit Priority Area (TPA)[5], where reduced parking ratios may be permitted and, for certain land uses, parking may not be required. However, for a conservative and realistic assessment of potential evacuation demand, Transit Area Overlay Zone parking rates were applied, as it is reasonable to assume that some level of parking would be provided on-site even where not strictly required. This approach is intended to represent an estimate of the number of vehicles that could be present during a worst-case evacuation scenario[6].

Based on the SDMC, under the current zoning, retail and general office uses were each assumed to generate 4.3 vehicles per 1,000 square feet, consistent with SDMC Table 142-05E. Under the proposed RM-3-9 zoning scenario, under shared parking assumptions, retail uses were also assumed to generate 4.3 vehicles per 1,000 square feet,

[4] SDMC highest minimum required parking per dwelling unit in a Transit Area, consistent with the 2023 ACS 5-Year Estimates Data profile
[5] https://webmaps.sandiego.gov/portal/apps/webappviewer/index.html?id=4efd01a2e06246adb36122fcf136f95d
[6] https://docs.sandiego.gov/municode/MuniCodeChapter14/Ch14Art02Division05.pdf[7] SDMC Section 142.0530 Table 142-05I

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while eating and drinking establishments were assumed to generate 12.8 vehicles per 1,000 square feet.[7] This assumption is based on SDMC Section 142.0545, which allows shared parking for adjacent mixed-use developments within the Transit Area Overlay Zone and determines required parking based on the highest hourly parking demand among the combined uses. Because the Project site allows a mix of residential and commercial uses, the shared parking ratios were used to estimate a conservative, worst-case number of vehicles that could be present on site during an evacuation. These rates were applied to the corresponding land use square footages for each zoning scenario, further described below, to estimate total vehicles under worst-case evacuation conditions.

The analysis herein is based on the maximum development potential of the project site under both the existing and proposed zoning. Under the proposed zoning the allowable GFA would decrease from the existing zoning if residential uses are developed and would only increase if past development were only commercial. Because no specific development is proposed at this time, the "project" is defined as any development scenario that could occur under the proposed CPA or Rezone. For the purposes of a conservative analysis, the land uses with the greatest generation of project vehicles were selected for a worst-case analysis. The Project included what was proposed for the Project site in the Midway-Pacific Highway Community Plan, adopted in September 2018. The proposed Project zoning would be supported by an Addendum to the Midway-Pacific Highway Community Plan EIR, which was certified in May 2018. Therefore, the Project reflects development that could occur under the proposed zoning. To assess potential environmental impacts and to demonstrate that no new or more severe impacts would occur beyond those previously identified, the methodology evaluates the delta between what was analyzed in the certified EIR (i.e., what is allowed under existing zoning) and what could occur under the proposed zoning. This analysis below evaluates the maximum development that could occur under each zoning scenario, and potential impacts are assessed based on the difference between the two.

Vehicle Generation - Existing Zoning Scenario

A worst-case scenario was applied to the existing zoning scenario in which the greatest number of vehicles associated with the land uses would be on-site at one time. Per the Midway-Pacific Highway Community Plan, adopted in September 2018, a base GFA of 1,398,276 square feet may be developed. If residential is built, then a Bonus GFA of 699,138 square feet may be also constructed, for a total GFA of 2,097,414 square feet. Under the current zoning designation of Commercial Office (CO-3-1), the development that would generate the greatest vehicular parking numbers for the worst-case scenario for an emergency evacuation is a maximum of 699 dwelling units, 209,741 square feet of retail, and 1,188,535 square feet as general office uses. These land uses were evaluated to determine the maximum number of vehicles that could be present during an emergency evacuation event, ensuring the analysis reflects a conservative and comprehensive assessment of the potential impacts associated with full buildout of the existing allowable land uses.

Per the 2023 ACS 5-Year Estimate Data, and confirmed with the SDMC, it was assumed that each dwelling unit would be expected to result in two vehicles for a total of 1,398 vehicles based on the maximum 699 residential units. Parking demand is conservatively assumed to represent complete occupancy of all provided parking spaces, rather than relying on a specific peak hour of the day, thereby assuming the maximum number of vehicles could be present on site at one time. The retail land use is assumed at a rate of 4.3 parking spaces per 1,000 square feet. Applying this rate to the 209,741 square feet of retail allowed under existing zoning results in approximately 902 vehicles. The remaining 1,188,535 square feet is assumed to be general office space, calculated at a rate of 4.3 vehicles per 1,000 square feet, to estimate an additional 5,111 vehicles. Utilizing the vehicle calculation

[7] SDMC Section 142.0530 Table 142-05I

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methodology described above, the total number of vehicles that would be expected to have to be evacuated in the worst-case scenario for the existing zoning scenario would be approximately 7,411 vehicles.

Table 1. Vehicle Parking Generation Under Existing Zone (CO-3-1)

Land Use Component	Number of Dwelling Unit or Gross Floor Area	On-Site Vehicle Parking Generation Rate[1]	Vehicles (Rounded)[2]
Residential	699,138 SF (699 du)	2 vehicles / du	1,398
Retail	209,741 SF	4.3 vehicles / 1,000 SF	902
General Office	1,188,535 SF	4.3 vehicles / 1,000 SF	5,111
Total GFA	**2,097,414 SF**	-	**7,411 Vehicles**

1. **Vehicle Parking Generation Rate**: Residential vehicle estimates are based on the San Diego Municipal Code for development within a Transit Area Overlay Zone. Residential parking is based on Table 142-05C for multiple dwelling units and uses an assumption of 2.0 spaces per dwelling unit, which is the highest Transit Area Overlay Zone ratio shown for standard unit types in the table. Retail and office parking generation rates are based on SDMC Section 142.0530 Table 142-05E
2. **Transit Priority Area Assumptions**: The Project site is located within a Transit Priority Area (TPA); however, as the site is also within a Transit Area Overlay Zone, the Transit Area Overlay Zone parking rates from the SDMC were applied for this analysis to provide a conservative but realistic estimate of potential evacuation vehicle demand, as many TPA land uses may not require parking.
3. **Calculation:** Residential parking = dwelling units × 2.0 spaces per dwelling unit. Retail parking = (gross floor area ÷ 1,000) × 4.3 spaces. General Office parking = (gross floor area ÷ 1,000) × 4.3 spaces. Vehicle totals are rounded to the nearest whole number.

Vehicle Generation - Proposed Zoning Scenario

A worst-case scenario was also applied to the proposed zoning scenario in which the greatest number of vehicles associated with the land uses would be on site at one time. The Proposed zoning would allow up to 1,165 dwelling units with a maximum of 1,887,673 SF. Non-residential land uses are limited to 10% of the total GFA. Consistent with the methodology described above, this analysis herein assumes that retail would be expected to generate the greatest number of vehicles and was therefore selected as the non-residential use type. Therefore, under the proposed rezone to Residential Multiple-Unit (RM–3-9), the site could be developed with up to 1,165 dwelling units along with 182,767 square feet of retail uses, of which 6,000 square feet can be eating and drinking establishments. These maximums were used to estimate the number of parked vehicles associated with the future zoning scenario and to evaluate how the proposed land use changes may affect evacuation-related vehicle demand.

Consistent with the existing zoning scenario, it was assumed that each dwelling unit would be assumed to result in two vehicles per unit, for a total of 2,330 vehicles based on the 1,165 residential units. As 90% of the gross floor area could be developed as residential, represented as the 1,165 units, the remaining 10% of the development is assumed to be developed as commercial including retail and Eating and Drinking establishments. Eating and Drinking establishments are estimated to generate parked vehicles at a minimum rate of 12.8 vehicles per 1,000 square feet. Therefore, applying this rate to the 6,000 SF eating and drinking results in approximately 77 vehicles. The retail land uses with the proposed zoning conditions could be developed up to 182,767 square feet and the associated vehicles are calculated using a rate of 4.3 vehicles per 1,000 square feet for retail. Applying this rate to the maximum 182,767 square feet of retail allowed under the proposed zoning results in 786 vehicles. Parking

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rates are assumed to represent the demand and highest occupancy, based on the SDMC minimum requirements, rather than relying on a specific peak hour of the day, thereby assuming the maximum number of vehicles could be present on site at one time. Utilizing the vehicle calculation methodology described above, the estimated total number of parked vehicles under the proposed zoning scenario is approximately 3,193 vehicles.

Table 2. Vehicle Parking Generation Under Proposed Zone (RM-3-9)

Land Use Component	Number of Dwelling Unit or Gross Floor Area	On-Site Vehicle Parking Generation Rate[1]	Vehicles (Rounded) [2]
Residential	1,165 dwelling units	2 vehicles / DU	2,330
Retail	182,767 SF	4.3 vehicles / 1,000 SF	786
Eating and Drinking Establishment	6,000 SF	12.8 vehicles/1,000 SF	77
Total GFA	**1,887,673 SF**	-	**3,193 Vehicles**

1. **Vehicle Parking Generation Rate**: Residential vehicle estimates are based on the San Diego Municipal Code for development within a Transit Area Overlay Zone. Residential parking is based on Table 142-05C for multiple dwelling units and uses an assumption of 2.0 spaces per dwelling unit, which is the highest Transit Area Overlay Zone ratio shown for standard unit types in the table. Retail and Eating and Drinking establishment parking generation rates for RM-3-9 is based on SDMC Section 142.0530 Table 142-05I, which provides the shared parking ratios applicable within the Transit Area Overlay Zone.
2. **Transit Priority Area Assumptions**: The Project site is located within a Transit Priority Area (TPA); however, as the site is also within a Transit Area Overlay Zone, the Transit Area Overlay Zone parking rates from the SDMC were applied for this analysis to provide a conservative but realistic estimate of potential evacuation vehicle demand, as many TPA land uses may not require parking.
3. **Calculation:** Residential parking = dwelling units × 2.0 spaces per dwelling unit. Retail parking = (gross floor area ÷ 1,000) × 4.3 spaces. Eating and drinking establishment parking = (gross floor area ÷ 1,000) × 12.8 spaces. Vehicle totals are rounded to the nearest whole number.

Comparison of Parked Vehicle Generation Under Existing and Proposed Zoning

The comparison of the existing and proposed zoning scenarios highlights the difference in potential evacuation-related vehicle demand associated with each land use zoning. The existing CO-3-1 zone allows for a greater amount of general office space and retail, which generates vehicles primarily through employment and customer-based land uses, whereas the proposed RM-3-9 zone shifts the intensity toward a greater number of dwelling units and a reduced amount of commercial area. Applying the minimum parking generation rates in a Transit Area Overlay Zone results in a comparative estimate of total vehicles for each scenario, illustrating how the rezone would be expected to result in a decrease in the total number of vehicles expected during an evacuation. As shown in Table 3, the proposed rezone would be expected to result in approximately 4,218 fewer vehicles than a project that could be developed in the existing zone. This comparison further provides a basis for evaluating how the proposed zoning change may influence emergency preparedness and associated vehicle circulation needs.

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Table 3. Vehicle Generation Comparison Table

Category	Existing Zoning (CO-3-1)	Proposed Zoning (RM-3-9)	Delta
Residential (DU)	699 DU	1,165 DU	+466 DU
Residential Vehicles (2 vehicles per du)	1,398 vehicles	2,330 vehicles	+932 vehicles
Retail/Commercial (GFA)	209,741 sf	182,767 sf	-26,974 sf
Retail/Commercial Vehicles	902 vehicles	786 vehicles	-116 vehicles
Eating and Drinking Establishment (GFA)	0	6,000 sf	+6,000 sf
Eating and Drinking Vehicles	0	77 vehicles	+77 vehicles
Office (GFA)	1,188,535 sf	0 sf	-1,188,535 sf
Office Vehicles	5,111 vehicles	0 vehicles	-5,111 vehicles
Total Vehicles	**7,411 vehicles**	**3,193 vehicles**	**-4,218 vehicles (-57%)**

Parked Vehicle Generation and Evacuation Time

The number of vehicles generated by land use directly influences the time required for full evacuation of the site, as the expected duration of an evacuation is driven largely by the volume of vehicles entering the roadway network during an emergency. Using an assumed average of two vehicles per dwelling unit and applying SDMC-based vehicle generation rates for retail, commercial, and office land uses, the total parking demand under each zoning scenario serves as a maximum number of vehicles expected to evacuate during a worst-case event in which all available parking spaces are occupied. Higher numbers of dwelling units or larger commercial/office floor areas result in increased vehicle counts, which have the potential to increase roadway congestion and extend evacuation clearance times.

The proposed Project will result in fewer vehicles than the maximum potential of the existing zoning scenario. The area is presently served by a comprehensive roadway network with multiple routes that will not be modified as a result of the Project. The roadway network in the site vicinity can work in tandem with the City's emergency planning for maximum efficiency of each roadway to systematically move people out of the area, should evacuation be deemed necessary. The proposed change in zoning, or possible land uses are not expected to cut off or otherwise negatively impact any the evacuation routes, such as the proximate major interstates, highways, and primary arterials within the City and San Diego County.

As previously noted, City, County, and state agencies can implement phased evacuations, prioritizing areas at highest risk to maintain traffic flow and reduce congestion. While additional vehicles in any area could increase

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overall evacuation demand, phased strategies help ensure an orderly process. The Project site is located within the Evacuation zone SDC-2048[8] as shown on Figure 6, Evacuation Zones – Genasys Protect Zones. Figure 6 depicts the City of San Diego's predefined evacuation zones used by emergency managers to communicate evacuation orders and warnings to specific geographic areas during an emergency. These zones are utilized for public alerting and operational coordination and do not represent hazard severity; rather, providing a framework for implementing and managing evacuations. Evacuations from the Project site within Zone SDC-2048 may occur simultaneously with the adjacent zones, depending on the nature and location of an emergency. The City of San Diego OES, in coordination with SDFD and SDPD, would manage operations to prioritize public safety, evacuating residents before the threat reaches the site or issuing alternative instructions, such as shelter-in-place orders for ignition-resistant structures and communities, while adjacent areas evacuate first. The reduction in evacuating vehicles under the proposed zoning logically supports a reduced evacuation time for the area.

Neither CEQA, nor the City or 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 City 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.

It must be noted that other existing roadway geometrics or traffic conditions (e.g., rush hour traffic, visibility, terrain, etc.) may influence the capacity of the local evacuation route segments. While rush-hour could impact evacuation efficiency, emergency response procedures allow for law enforcement to implement traffic control measures and, if necessary, restrict or shut down roadways to general traffic to dedicate the full roadway capacity to evacuees. Because of the connectivity of the freeways, evacuees can typically be considered safe when they get to the freeways, if not sooner. 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.

3.1.3 Existing Versus Proposed Site Zoning

The number of evacuating vehicles is influenced by multiple variables, including the time of day and the corresponding occupancy levels of different land uses. At night, for example, commercial, retail, and office uses would generally be closed and unoccupied, while residential use would be expected at or near their maximum occupancy. During daytime hours, these patterns shift as nonresidential uses experience higher activity levels and residential occupancy decreases accordingly. To ensure a conservative analysis, the evaluation assumes maximum capacity across all associated land uses, representing the highest potential vehicle demand regardless of when an evacuation might occur.

It is reasonable to assume that an increase in Average Daily Trips (ADT) and peak hour vehicles could contribute to longer evacuation times. However, it is important to note that during a wildfire or other emergency that results in the evacuation of an area, background traffic patterns are altered. ADT and peak hourly trips can serve as baseline indicators by providing the number of vehicles utilizing the local road network under typical conditions. Peak hour trips represent the volume typically accommodated in one hour under typical conditions. Evacuation traffic could exceed these typical peak hour vehicle counts and could involve unique behavioral and operational factors such as

[8] https://protect.genasys.com/location?z=14.2852661802883&latlon=32.7460764907855%2C-117.20234844965364

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decision-making time or law enforcement officials directing traffic and sending vehicles down particular routes. Therefore, while relevant to typical conditions, ADT and peak hour traffic would not account for emergency conditions and would not account for the simultaneous departure of occupants.

The maximum that could be built under current zoning which would result in the greatest number of evacuating vehicles is a maximum of 699 dwelling units, 209,741 square feet of retail, and 1,188,535 square feet as general office uses, which would generate 7,411 vehicles. Under the proposed zoning the maximum that could be built that would result in the most evacuating vehicles is 1,165 dwelling units along with 182,767 square feet of commercial uses, and 6,000 SF eating and drinking establishments, generating a total of 3,193 vehicles. With the proposed change in zoning, the rezone is estimated to represent a reduction in potential vehicles evacuating by 4,218 vehicles. Expressed as a percentage change, the proposed reduces the largest number of evacuating vehicles in the evacuating area by 57%. The site has multiple points of connection for occupants to access the existing roadway network extending to Pacific Highway, Rosecrans Street to Camino Del Rio West to I-8, and I-5.

3.2 Potential Evacuation Impact Assessment

The City and County of San Diego have 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. The project does not propose development at this time; however all future developments would be constructed to then current codes, which would allow for the site to have multiple evacuation routes with code-compliant road widths, 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.

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. Citizen reactions may vary during an evacuation event, although orderly movement during wildfire and other emergencies is not typically unmanageable with proper preparation by emergency managers (Maranghides and Link 2025). 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.

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4 California Environmental Quality Act

CEQA is a disclosure law, meaning it requires the Lead Agency (the city) 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 Evacuation, there are two questions that are evaluated for Projects in or near Very High Fire Hazard Severity Zones, which the Project is not:

- *Does the Project substantially impair an adopted emergency response plan or emergency evacuation plan?* The rezoning of the site and the associated land uses that could therefore be built as a result of the rezone would not impact an adopted emergency response plan or emergency evacuation plan. Future development of the site would not be permitted to be designed to block or re-route existing roadways/evacuation routes or propose actions or approaches that are conflicting with local Emergency Operations or Response Plans.
- *Would the Project Expose People or Structures Either Directly or Indirectly, to a Significant Risk of Loss, Injury, or Death Involving Wildland Fire?* The Project site is not expected to experience wildfire hazards comparable to those in designated FHSZs. Nevertheless, all development would be required to comply with applicable fire protection requirements, including the California Building Code (CBC) and California Fire Code (CFC), as amended and adopted by the city, to ensure structures are constructed with features that minimize vulnerability to fire. Furthermore, due to the existing paved roadways and development surrounding the site, the Project would not exacerbate off-site wildfire risk. The Project reduces the maximum number of potential evacuating vehicles by 57% and therefore represents a potential improvement in evacuation times for the region.

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

The Midway–Pacific Highway CPU EIR (2018), evaluated wildfire risk and emergency access and evacuation under Chapter 5.6, Public Health and Safety, including Impact Analysis Section 5.6.3, Issue 1 (Wildland Fire Risk) and Issue 3 (Emergency Plan Consistency). That analysis was based on development assumptions consistent with the CO-3-1 zoning designation, which allowed a greater proportion of office and commercial land uses and associated vehicle activity than would be permitted under the proposed Residential Multiple-Unit (RM-3-9) zoning. The CPU EIR concluded that compliance with applicable building and fire codes, together with the established roadway network and emergency response framework, would result in less-than-significant impacts related to wildfire risk and would not impair implementation of adopted emergency response or evacuation plans, including under cumulative conditions (CPU EIR, Chapters 5.6 and 6.0).

This Post Point hazard and evacuation memo assesses the proposed Post Point rezone relative to those CPU EIR assumptions. While the proposed zoning would allow additional residential units on the Project site, it would reduce the office development potential associated with the CO-3-1 designation and, under a conservative worst-case analysis, would generate fewer total vehicles during a potential evacuation than the maximum buildout assumed under existing zoning. When considered cumulatively, the proposed Post Point rezone would not increase evacuation vehicle demand relative to the maximum development potential evaluated under the existing designation; rather, it would reduce the site-specific contribution to potential evacuation traffic. The Project does not eliminate or constrain any evacuation routes identified, nor does it introduce new population concentrations in

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a FHSZ or otherwise create evacuation constraints. Accordingly, the conclusions of this hazard and evacuation analysis are consistent with the CPU EIR and demonstrate that the proposed rezone would not expose people or structures to a significant wildfire risk or impair implementation of adopted emergency response or evacuation plans.

5 Conclusions

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

5.1 Evacuation Analysis

To summarize Section 1 through 3 of this technical memorandum, the Project analysis is based on the change in land use previously evaluated under the EIR (i.e., what is allowed under the existing zoning) and what would allowed in the ministerial ("by-right") process under the proposed zoning. The Project proposes to redesignate the project site from Business Park – Residential Permitted to Residential – High in the Midway-Pacific Highway Community Plan (2018), a rezone from CO-3-1 to Residential–Multiple Units 3-9 (RM-3-9). No physical development is proposed as part of the project; the analysis of the project considers the development of all potential land uses that could be constructed within the project site as a result of the CPA and Rezone.

This area is presently served by a sufficient transportation network with multiple nearby major transportation corridors, including Pacific Highway, I-5 and I-8, which would be unlikely to be overwhelmed by the addition of more vehicles. The rezoning would be expected to result in 57% fewer vehicles that may be on site during the analysis scenario. As described above in Section 3.1.2, with the proposed change in zoning, the rezone is estimated to represent a reduction in potential vehicles evacuating by 4,218 vehicles. The maximum that could be built under current zoning that would result in the greatest number of evacuating vehicles is 699 dwelling units, 209,741 square feet of retail, and 1,188,535 square feet as general office uses, which would be expected to generate approximately 7,411 vehicles. Under the proposed zoning the maximum that could be built that would result in the most evacuating vehicles is 1,165 dwelling units along with 182,767 square feet of commercial uses, and 6,000 square feet of eating and drinking establishments, which would be expected to generate a total of approximately 3,193 vehicles.

The roadway network can work in tandem with the City of San Diego'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 the City of San Diego's or the County's evacuation routes. The Project would be expected to include layered fire protection features and not be exposed to wildfire. 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.

5.2 CEQA Analysis

Based on the assumptions analyzed in this technical memo, the Project is not required to be reviewed against the Wildfire Questions in Appendix XX because the project is not in or near a Fire Hazard Severity Zone. Nonetheless, it

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is unlikely that the Project creates impacts under any of the Wildfire CEQA thresholds due to the inherent safety of complying with modern fire and building codes as well as the lack of exposure to wildfire, and the possible evacuation contingency options offered to emergency management professionals. These conclusions are consistent with the findings of the Midway–Pacific Highway CPU EIR, which evaluated wildfire risk and emergency response under a more intense CO-3-1 zoning scenario and determined impacts to be less than significant, including under cumulative conditions. The proposed rezone would not impair emergency response or evacuation plans and would reduce the Project's contribution to evacuation demand relative to the evaluated CPU EIR assumptions.

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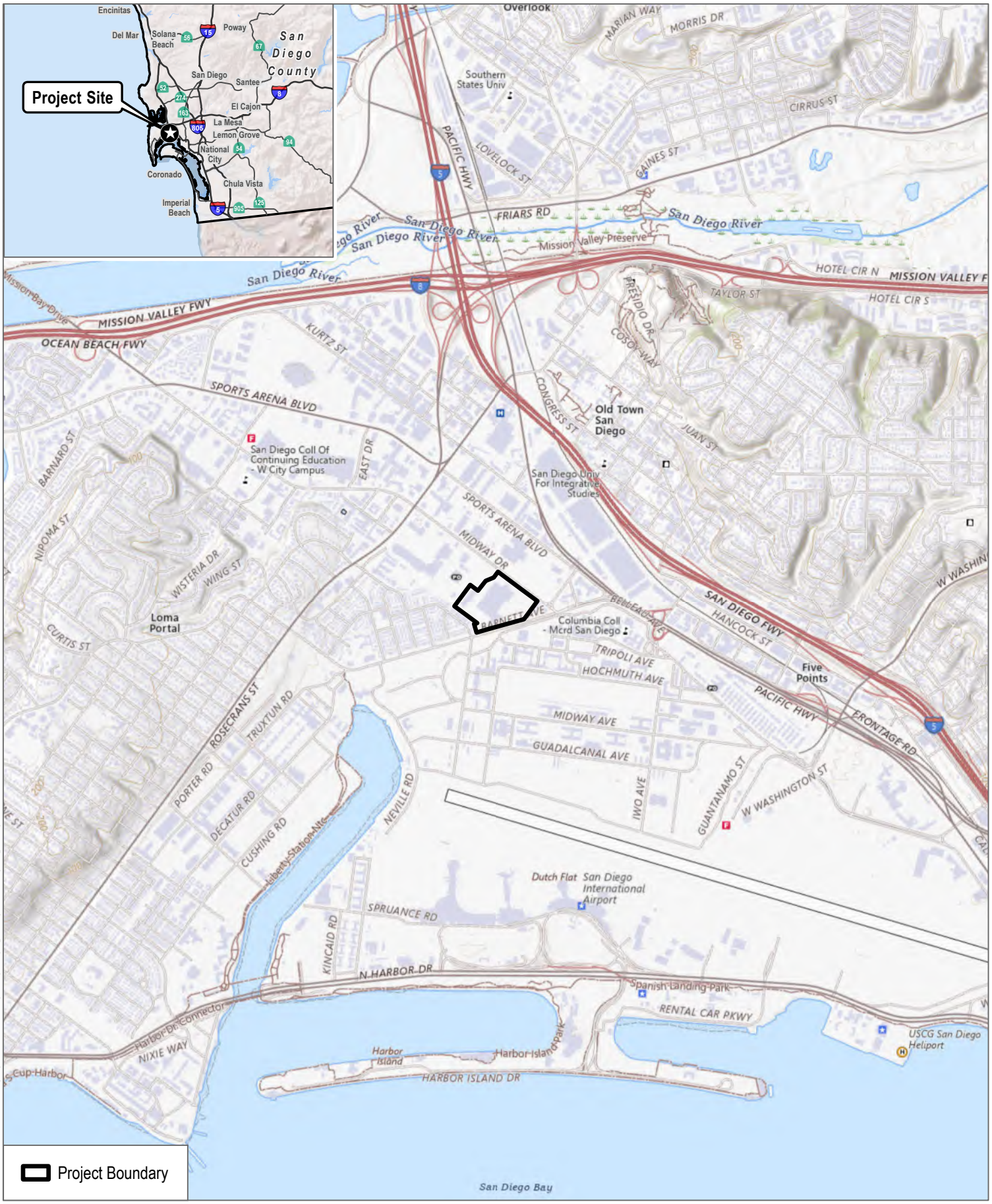
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Attachment
Figures 1-9

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SOURCE: USGS National Map 2026

DUDEK

0 1,000 2,000 Feet

FIGURE 1

Project Location

Post Point Project



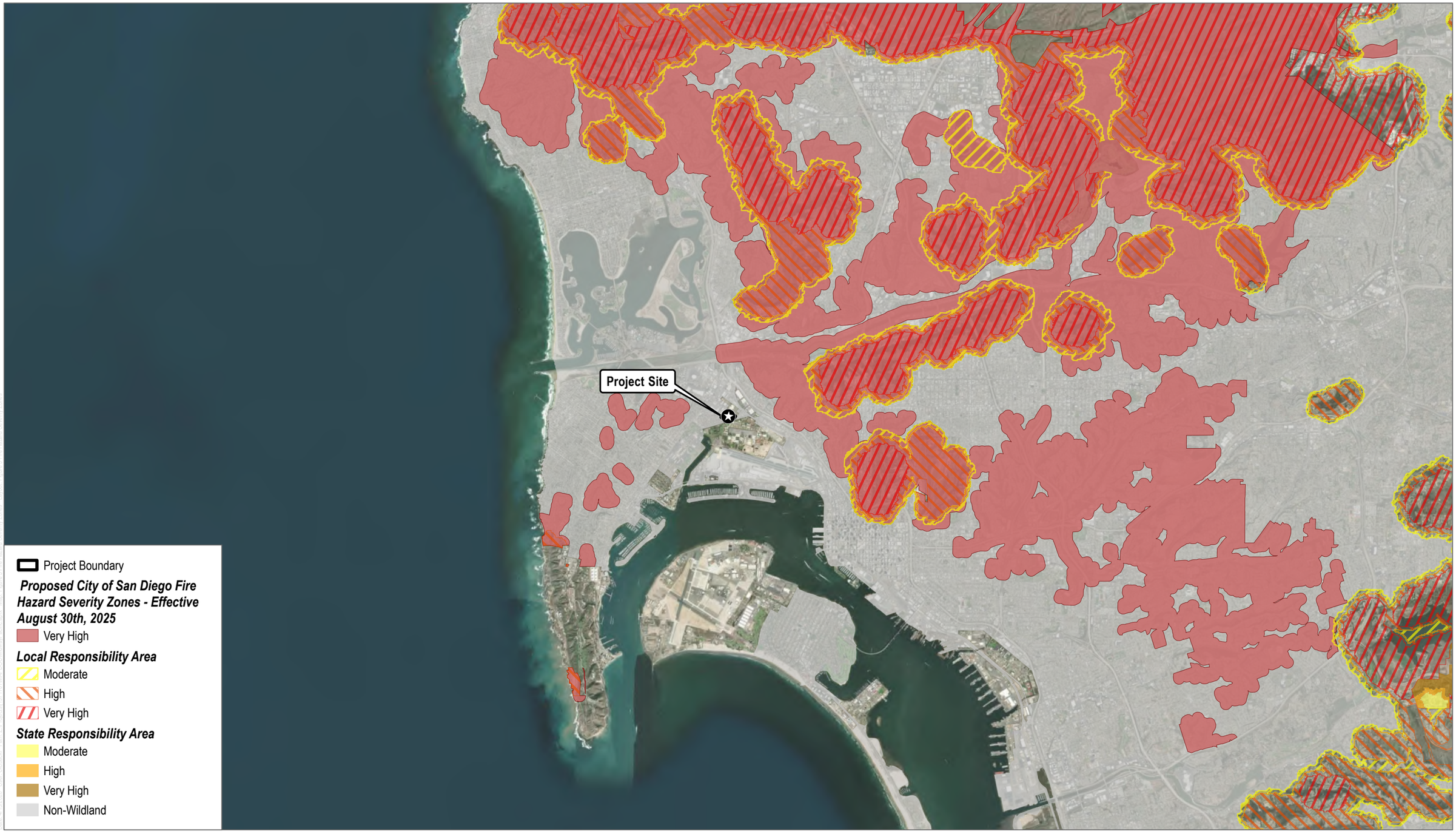
SOURCE: Vantor 2025

FIGURE 2

Proposed Site Plan

Post Point Project

DUDEK



SOURCE: Maxar 2024; CalFire 2025

DUDEK

0 4,000 8,000 Feet

FIGURE 3

Fire Hazard Severity Zones

Post Point Project



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

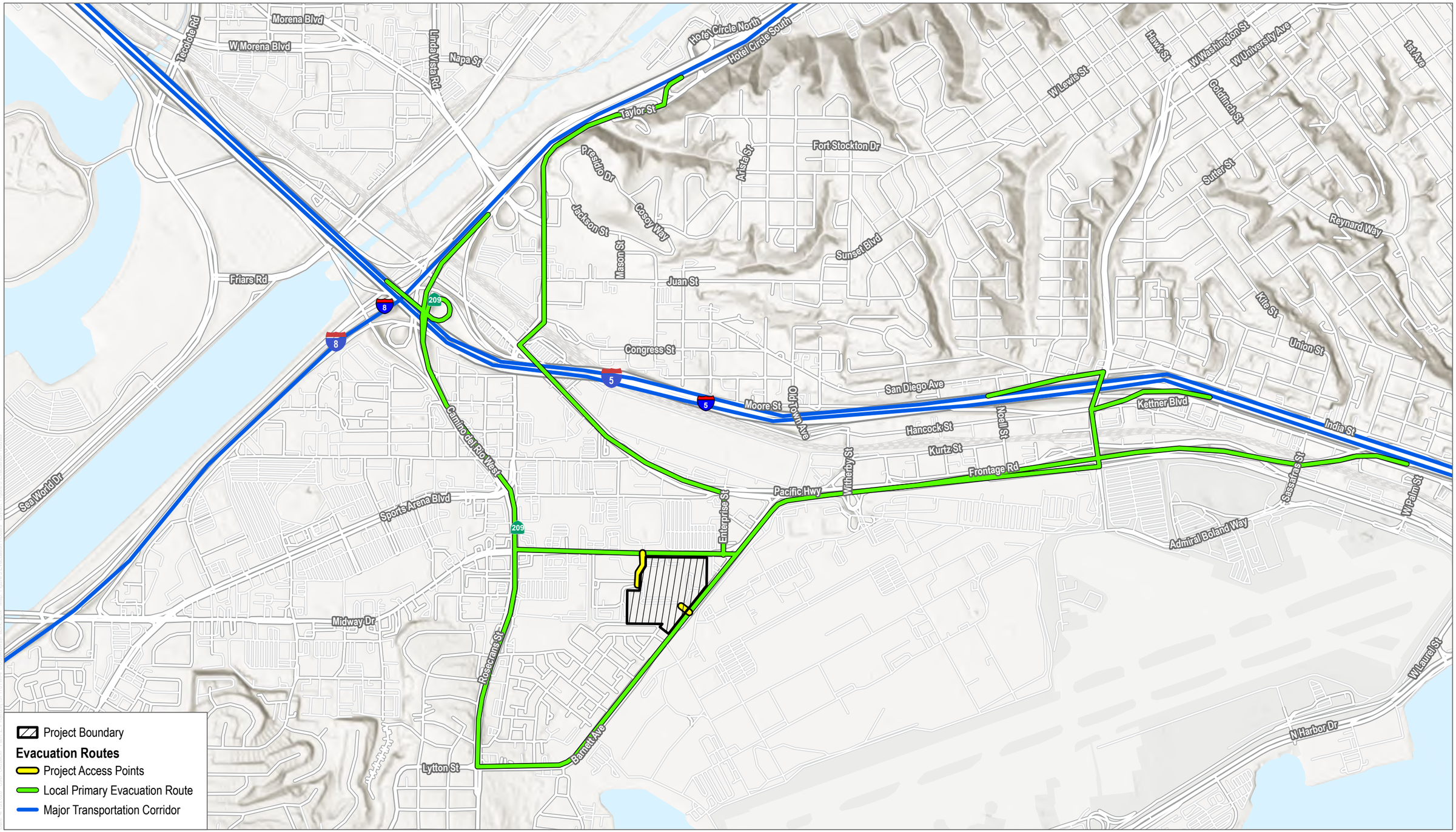
DUDEK

0 2,900 5,800 Feet

FIGURE 4

Fire History Map

Post Point Project



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

DUDEK

0 550 1,100 Feet

FIGURE 5

Evacuation Routes

Post Point Project



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

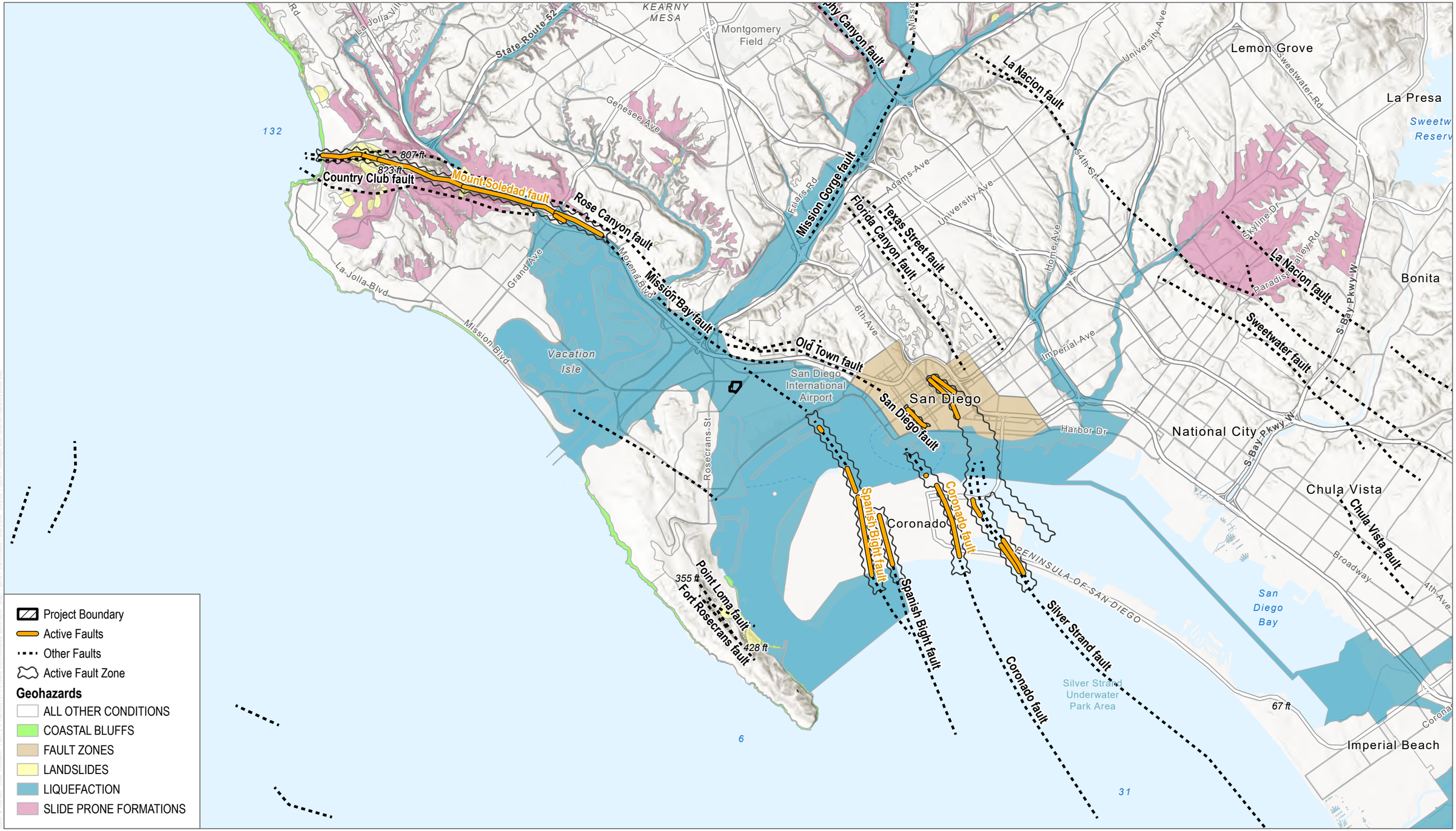
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0 700 1,400 Feet

FIGURE 6

Evacuation Zones - Genasys Protect Zones

Post Point Project



SOURCE: Open Street Maps 2019; CA Dept. of Conservation 2019; SANGIS 2023

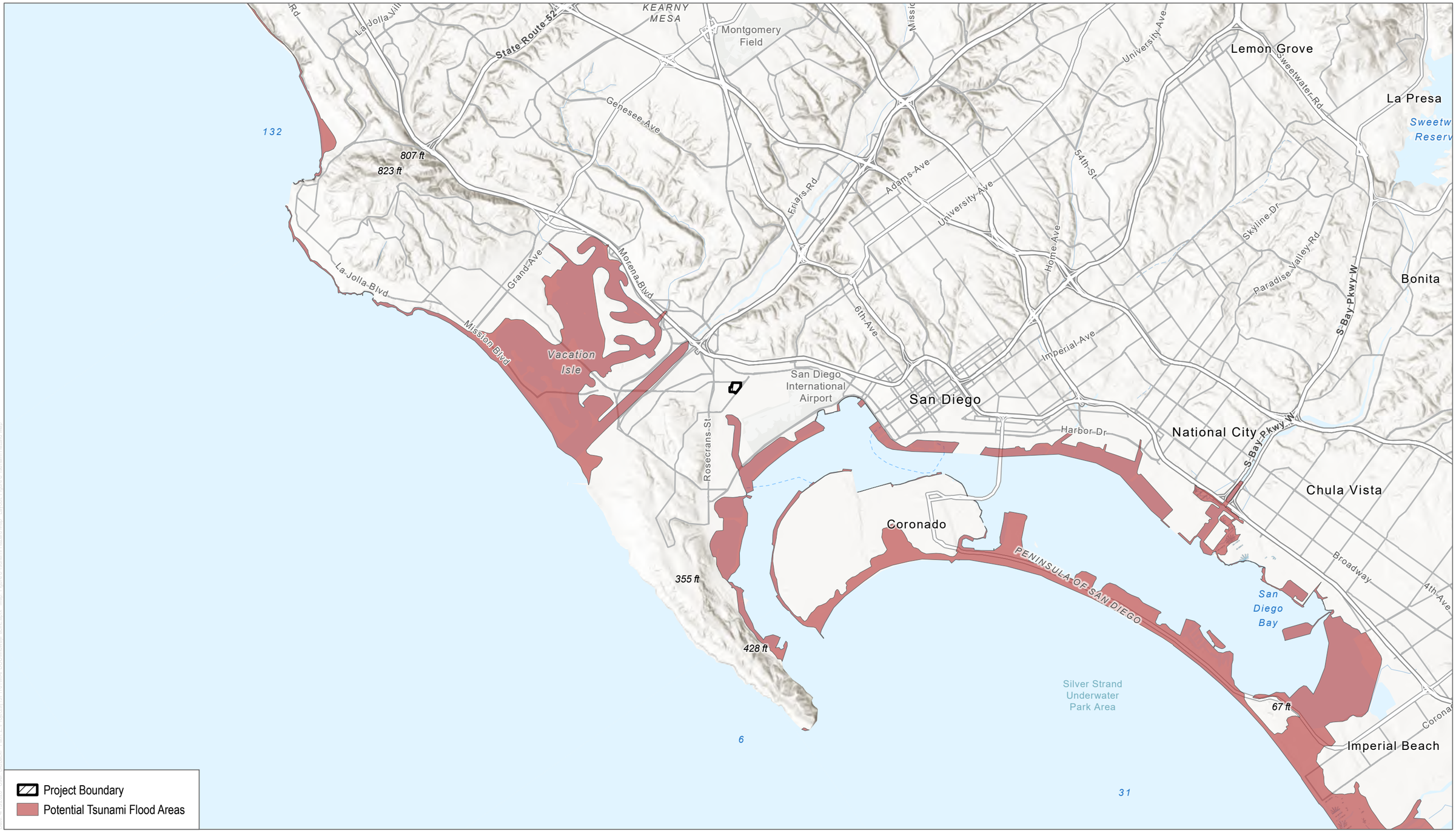
DUDEK

0 0.5 1 Miles

FIGURE 7

Geologic and Seismic Hazard Zones Map

Post Point Project



SOURCE: Open Street Maps 2019; CA Dept. of Conservation 2019

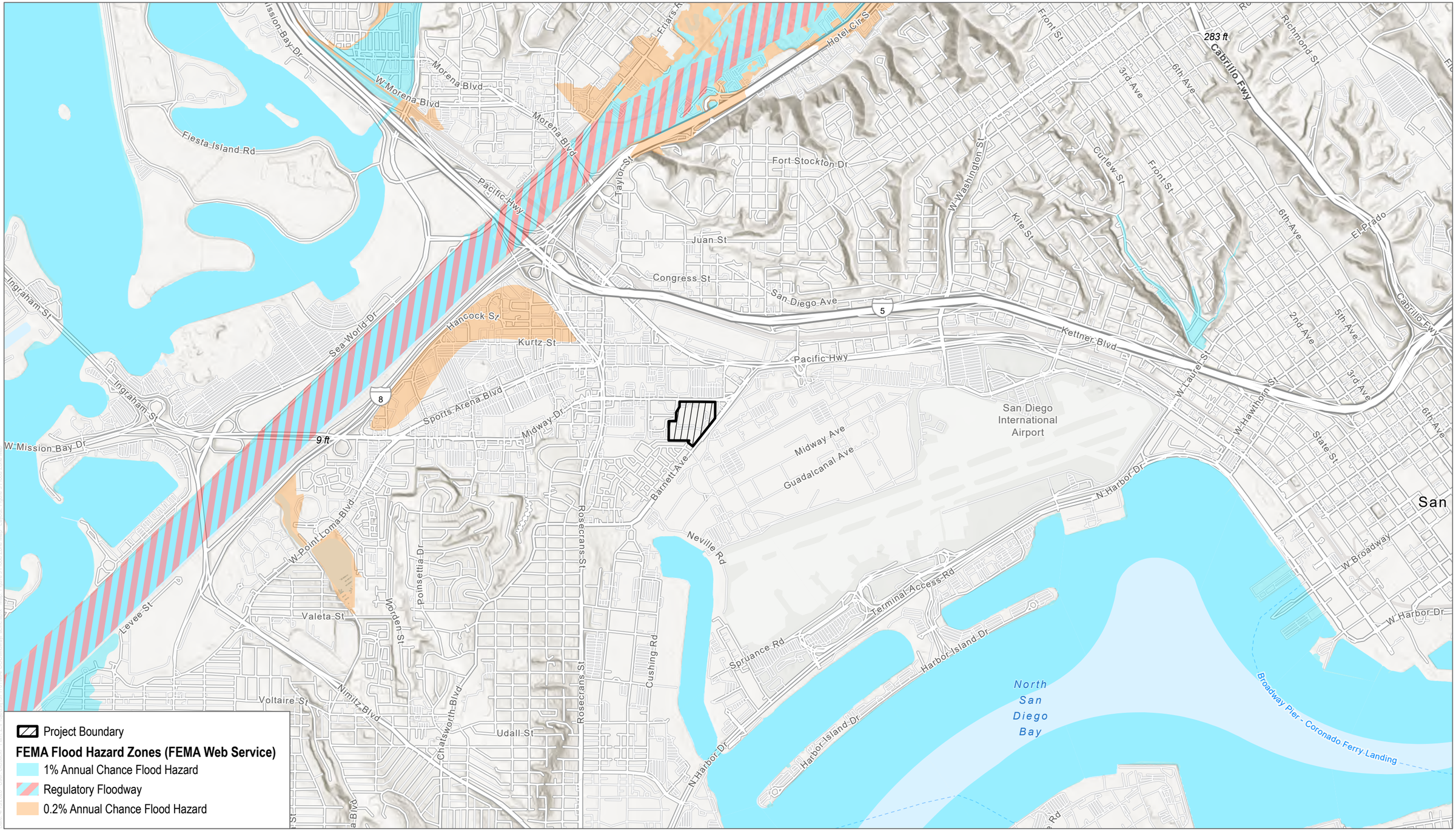
DUDEK

0 0.5 1 Miles

FIGURE 8

Tsunami Hazard Map

Post Point Project



SOURCE: Open Street Maps 2019; FEMA 2024

DUDEK

0 1,000 2,000 Feet

FIGURE 9

Flood Zone Map

Post Point Project