

# **Appendix J**

## **Reax Memo Re Attorney General Guidance**



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April 13, 2023

Kim Avila, AICP ENV SP  
Kimley-Horn  
660 S. Figueroa Street, Suite #2050  
Los Angeles, CA 90017

Re: Attorney General Wildfire Guidance Overview, Prepared for the Los Angeles Aerial Rapid Transit Project Final Environmental Impact Report

Dear Ms. Avila:

In October 2022, the California Attorney General published guidance for lead agencies to analyze and mitigate wildfire risks under CEQA for new development (“Wildfire Guidance”). The Wildfire Guidance focuses on CEQA compliance related to a proposed project’s impacts on wildfire ignition risk, emergency access, and evaluation. The Wildfire Guidance recommends evaluation of local fire history, fire characteristics of the site (weather, slope, etc.), anticipated fire behavior, evacuation, and other factors that may influence a project’s potential to cause wildfire impacts under CEQA. The Guidance is not binding on lead agencies and is intended to provide “suggestions” for the CEQA wildfire analysis. The Wildfire Guidance recognizes that projects located within already developed urban areas do not require the same level of analysis as a non-urban project surrounded by wildland and open space.

Consistent with the Wildfire Guidance, and taking into account that the proposed Project would primarily occur within an existing urbanized area, Section 3.1 of our Fire Hazard Assessment issued in connection with the Draft EIR provides an assessment of the local fire history, Sections 3.2 to 3.4 provide an overview of site characteristics, including weather, slope, and fire response, Section 3.5 provides an overview of anticipated fire behavior, Section 4.0 provides an overview of operational fire hazard, and Section 5.0 provides an analysis of site-specific construction hazards, taking into account the topography, fuels, climate/weather patterns, and the fire history for the portions of the Project alignment within the Very High Fire Hazard Severity Zone. Section 6.0 provides a list of recommended project design features to provide additional environmental benefits by further reducing risks associated with wildfires.

Accordingly, the previously issued Fire Hazard Assessment considers the Wildfire Guidance’s recommended topics for evaluation in connection with the proposed Project’s potential wildfire impacts.

Sincerely,

A handwritten signature in black ink, appearing to read "D.B. Rich".

David B. Rich, PhD  
Principal, Reax Engineering