California Public Resources Code Section 21003 (f) states: "...it is the policy of the state that...[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." This policy is reflected in the State California Environmental Quality Act (CEQA) Guidelines (Guidelines) Section 15126.2(a), which states that "[a]n EIR [environmental impact report] shall identify and focus on the significant environmental impacts of the proposed project" and Section 15143, which states that "[t]he EIR shall focus on the significant effects on the environment."

This chapter includes an environmental analysis and finding of no impact or less than significant impact for the topics precluded from detailed discussion in Chapter 5, *Environmental Analysis*, of the Draft Program EIR (PEIR). Guidelines Section 15128 requires a statement briefly indicating the reasons that various possible significant effects of the General Plan Update (GPU) were determined not to be significant and were therefore not discussed in detail.

8.1 AGRICULTURE AND FORESTRY RESOURCES

Would development in the plan area:

Impact 8-1: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency to non-agricultural use.

No Impact. The proposed GPU would allow for the development of a mix of uses in highly urbanized areas of the city. Furthermore, the entire City of Santa Ana is nearly built out. According to the California Resource Agency's Department of Conservation (DOC 2016), the city does not have any significant agricultural resources (see Figure 8-1, *City of Santa Ana Agricultural Resources*). Therefore, no impacts to farmland would occur under the proposed project, and no further analysis is required in the PEIR.

Impact 8-2: Conflict with existing zoning for agricultural use, or a Williamson Act contract.

No Impact. Santa Ana has no land designated or zoned for agricultural use (Santa Ana 2019). Furthermore, Santa Ana does not have any land subject to a Williamson Act contract (DOC 2004). Thus, no impacts to agricultural zoning or a Williamson Act contract would occur, and no further analysis is required in the PEIR.

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Impact 8-3: Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).

No Impact. Santa Ana does not have any land designated or zoned for forestland, timberland, or timberland zoned Timberland Production (Santa Ana 2019). Thus, the proposed project would have no impacts on forest land in the city and no further analysis is required in the PEIR.

Impact 8-4: Result in the loss of forest land or conversion of forest land to non-forest use.

No Impact. See Impact 8-3, above.

Impact 8-5: Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

No Impact. See Impacts 8-1, 8-2, and 8-3, above.

8.2 WILDFIRE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if located in or near state responsibility areas or lands classified as very high fire hazard severity zones.

Wildland fire protection in California is the responsibility of either the State, local government, or the federal government. State responsibility areas (SRA) are the areas where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA forms one large area over 31 million acres, for which the State Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services.

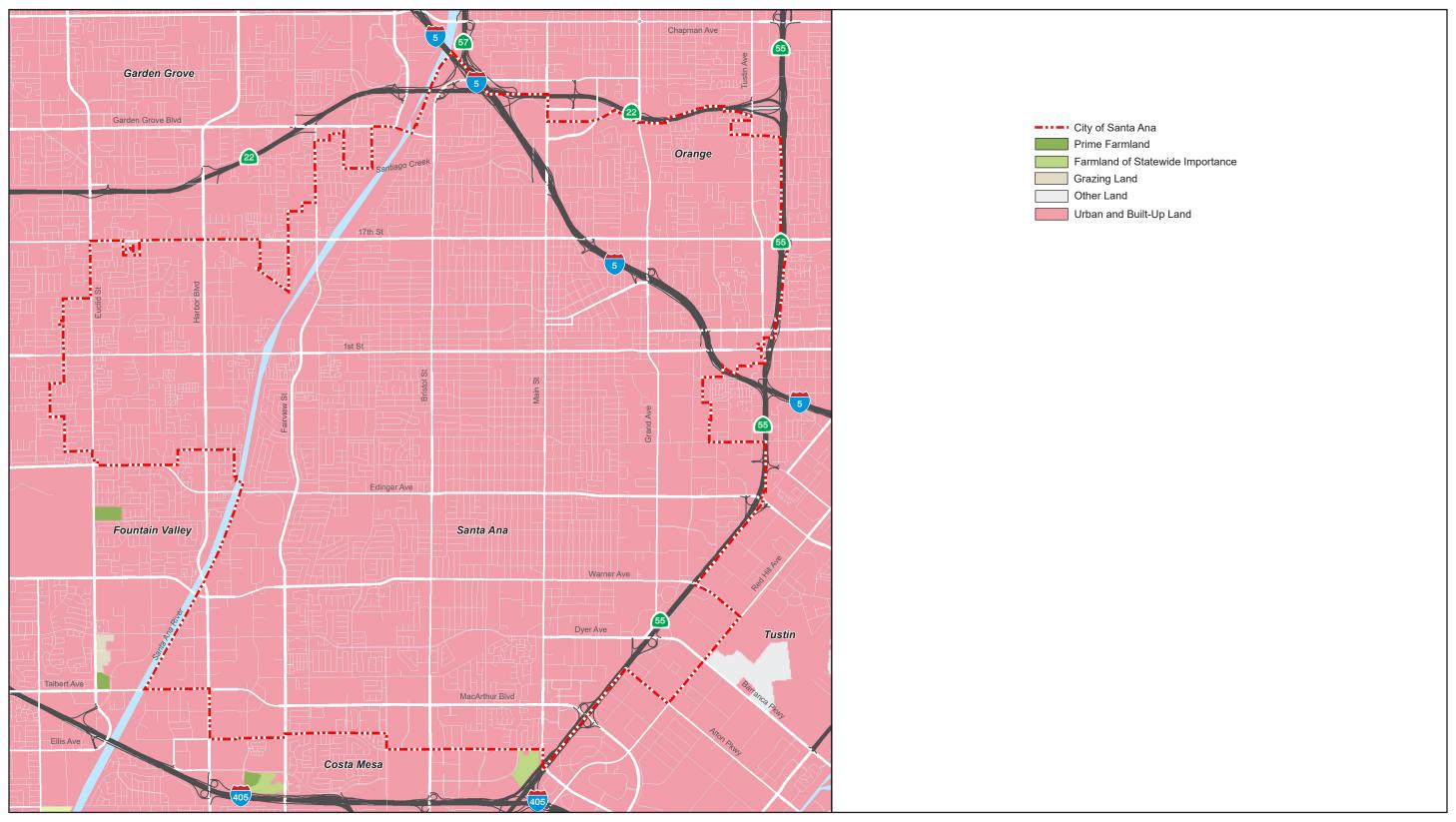
Local responsibility areas (LRA) include incorporated cities, cultivated agriculture lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government (CAL FIRE 2012). CAL FIRE uses an extension of the state responsibility area fire hazard severity zone model as the basis for evaluating fire hazard in local responsibility areas. The local responsibility area hazard rating reflects flame and ember intrusion from adjacent wildlands and from flammable vegetation in the urban area.

CAL FIRE is mandated by California Public Resources Code Sections 4201 to 4204 and California Government Code Sections 51175 to 51189 to identify fire hazard severity zones (FHSZ) for all communities in California. These are areas of significant fire hazard based on fuels, terrain, weather, and other relevant factors. In SRAs, CAL FIRE has mapped three hazard ranges—moderate, high, and very high. In a local responsibility area, the law only requires identification of very high FHSZs. Local governments accept CAL FIRE's determination or make other, local determinations.

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PlaceWorks

Figure 8-1 - Santa Ana Agricultural Resources





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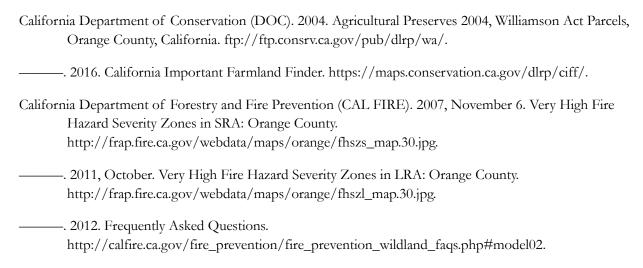
The wildland-urban interface (WUI) is the area within or adjacent to an "at-risk community" that is identified in recommendations to the Secretary of Agriculture in a Community Wildfire Protection Plan or is any area for which a Community Wildfire Protection Plan is not in effect but is within 0.5 mile of the boundary of an "at risk community." An "at risk community" is defined as:

- An interface community as defined in the notice "Wildland Urban Interface Communities Within the Vicinity of Federal Lands That Are at High Risk from Wildfire," issued by the Secretary of Agriculture and the Secretary of the Interior
- Or a group of homes and other structures with basic infrastructure and services (such as utilities and collectively maintained transportation routes) within or adjacent to federal land and in which conditions are conducive to a large-scale wildland fire which could pose a significant threat to human life or property (DOA 2019).

A WUI is also any area that is within 1.5 miles of an "at risk community" and has sustained steep slopes that may affect wildfire behavior, has a geographic feature that aids in creating an effective fuel break, or is in fuel condition class 3.1 An area adjacent to evacuation routes for an "at risk community" is another example of a WUI.

The nearest FHSZ in an SRA to the City of Santa Ana is a high FHSZ about 4.0 miles east along the western edge of Loma Ridge. The nearest FHSZ in an LRA is about 3.8 miles at the southern tip of the Peters Canyon Regional Park (CAL FIRE 2011, 2007). Therefore, the city is not in or near SRAs or lands classified as very high FHSZs. Additionally, no area in the city is a WUI (UWM 2010). Therefore, no impacts would occur. The remaining wildfire questions in Appendix G are not relevant to the GPU.

8.3 REFERENCES



An area classified as fuel condition class 3 implies that the current condition of the vegetation within the area would not be sustainable due to the absence of two or more natural fire cycles. In other words, an excess of vegetation and fuels has occurred due to the exclusion of fire which naturally reduces the level of forest fuels.

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