

3.2 AGRICULTURE AND FORESTRY RESOURCES

This section describes existing agriculture and forestry resources within the LRDP area, including identification of Important Farmland, timberland, and forest land. The analysis includes a description of the existing environmental conditions including applicable regulatory requirements, the methods used for resource and impact assessment, and the potential direct and indirect impacts of the 2021 LRDP's implementation on agriculture and forestry resources.

Comments received on the NOP (see Appendix B) related to agriculture and forestry resources included concerns related to tree removal, the need for a Timberland Conversion Permit (TCP) or Timber Harvest Plan (THP) prior to cutting trees, protection of grazing lands, potential loss of land designated as agricultural by the County's Local Coastal Program (LCP), and protection of the Center for Agroecology and Sustainable Food Systems (CASFS) farm and the Arboretum & Botanic Garden. All comments related to agriculture and forestry resources are addressed, where appropriate, in this section.

3.2.1 Regulatory Setting

FEDERAL

There are no federal regulations related to agriculture and forest resources that apply to the LRDP.

STATE

California Department of Conservation Farmland Mapping and Monitoring Program

Important Farmland in California is classified and mapped according to the California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (FMMP). Authority for the FMMP comes from Government Code Section 65570(b) and Public Resources Code (PRC) Section 612. Government Code Section 65570(b) requires the Department of Conservation to collect or acquire information on the amount of land converted to or from agricultural use for every mapped county and to report this information to the Legislature. PRC Section 612 requires DOC to prepare, update, and maintain Important Farmland Series Maps and other soils and land capability information.

The California Land Conservation Act of 1965

The California Land Conservation Act of 1965, or Williamson Act, preserves agricultural and open space lands through property tax incentives and voluntary restrictive use contracts. Private landowners voluntarily restrict their land to agricultural and compatible open-space uses under minimum 10-year rolling term contracts. In return, restricted parcels are assessed for property tax purposes at a rate consistent with their actual use, rather than potential market value. As UC is a tax-exempt entity, land owned by UC is not eligible for registration pursuant to the Williamson Act.

California Public Resources Code

Agricultural and forestry land within California are defined by the PRC as follows:

- ▶ Section 21060.1(a) defines "agricultural land" as prime farmland, farmland of statewide importance, or unique farmland, as defined by the United States Department of Agriculture land inventory and monitoring criteria, as modified for California.
- ▶ Section 21060.1(b) states the following: In those areas of the state where lands have not been surveyed for the classifications specified in subdivision (a), "agricultural land" means land that meets the requirements of "prime agricultural land" as defined in paragraph (1), (2), (3), or (4) of subdivision (c) of Section 51201 of the Government Code.

- ▶ Section 21095 amended the California Environmental Quality Act to provide lead agencies with an optional methodology, the Land Evaluation and Site Assessment (LESA) model, to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process. The LESA Model evaluates measures of soil resource quality, a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, the factors are rated, weighted, and combined, resulting in a single numeric score. The project score becomes the basis for making a determination of a project's potential significance.
- ▶ Section 12220(g) defines "forest land" as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.
- ▶ Section 4526 defines "timberland" as land, other than land owned by the federal government and land designated by the State Board of Forestry and Fire Protection as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis.

California Department of Forestry and Fire Protection

The California Department of Forestry and Fire Protection (CAL FIRE) enforces the laws that regulate logging on non-federal lands in California. CAL FIRE also provides periodic assessments of forest resources within California as part of the Fire and Resource Assessment Program. The *California's Forests and Rangelands: 2017 Assessment* presents an assessment of the trends, conditions, and degree to which forest and rangeland conversion has occurred. CAL FIRE also maintains the Forest Legacy Program, which is intended to identify and protect environmentally important forestlands that are threatened by conversion of land to non-forest uses by either purchase or through deed restrictions, such as conservation easements.

On October 30, 2015, Governor Brown issued an emergency proclamation and established the California Tree Mortality Task Force (now a working group under the Forest Management Task Force). On September 1, 2017, Governor Brown issued Executive Order B-42-17 to bolster the State's response to unprecedented tree die-off. One goal of the Task Force was to identify and map areas of tree mortality that pose the greatest potential of harm to people and property. These areas, known as High Hazard Zones, are the areas prioritized for tree removal. The Task Force aims to increase the rate of forest treatments and expand state wood product markets through innovation, assistance, and investment. Advancing forest health project capacity, readiness, and completion statewide aligns with the California Forest Carbon Plan, the goal of which is to establish healthy and resilient forests that can withstand and adapt to wildfire, drought, and a changing climate.

Z'Berg-Nejedly Forest Practice Act of 1973

The Z'Berg-Nejedly Forest Practice Act of 1973 (FPA) (PRC Sections 4511-4630.2) established the State Board of Forestry and Fire Protection, whose mandate is to protect and enhance the State's unique forest and wildland resources. This mandate is carried out through enforcement of the California Forest Practice Rules (California Code of Regulations [CCR]), Title 14, Chapters 4, 4.5, and 10). CAL FIRE enforces the laws that regulate logging on non-federal lands in California. Additional rules enacted by the State Board of Forestry and Fire Protection are also enforced to protect forest and wildland resources. The FPA is intended to achieve "maximum sustained production of high-quality timber products... while giving consideration to values relating to recreation, watershed, wildlife, range and forage, fisheries, regional economic vitality, employment and aesthetic enjoyment" (PRC Section 4513[b]). The regulations created by the FPA define factors such as the size and location of harvest areas, include measures to prevent unreasonable damage to residual trees, and address the protection of riparian areas, water courses and lakes, wildlife, and habitat areas.

Z'Berg-Warren-Keene-Collier Forest Taxation Reform Act of 1976

Pursuant to the Z'berg-Warren-Keene-Collier Forest Taxation Reform Act of 1976, counties were required to provide for the zoning of land used for growing and harvesting timber as Timberland Production Zones (TPZs) (see California Government Code Section 51110(b)). A TPZ is a 10-year restriction on the use of land, and replaced the use of

agricultural preserves (Williamson Act contracts) on timberland. Land use under a TPZ is restricted to growing and harvesting timber, and to compatible uses approved by the County. In return, taxation of timberland under a TPZ is based only on such restrictions in use.

California Timberland Productivity Act of 1982

The California Timberland Productivity Act of 1982 (California Government Code Sections 51100-51155) identifies the benefits of the State's timberlands and acknowledges the threat of timberland loss via land use conversions. The law identifies policies intended to preserve timberland, including maintaining an optimum amount of timberland, discouraging premature conversion, discouraging expansion of urban land uses into timberlands, and encouraging investments in timberland. The law establishes TPZs on all qualifying timberland, which is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses. The law also provides that timber operations conducted in a manner consistent with forest practice rules under the FPA shall not be or become restricted or prohibited because of any land use in or around the locality of those operations.

California Forest Practice Rules

The California Forest Practice Rules of 2012 define the timber harvest activities that are regulated under CCR Title 14, Chapters 4, 4.5, and 10, and under the FPA (PRC Sections 4511-4630.2). CAL FIRE is the enforcing agency responsible for ensuring that logging and other forest harvesting activities are conducted in a manner that preserves and protects fish, wildlife, forests, and streams.

Before harvesting of commercial trees may occur, landowners must prepare a THP, which outlines the timber proposed for harvesting, the methods of harvesting, and the steps that will be taken to prevent damage to the environment. THPs are required to be prepared by Registered Professional Foresters. In addition, when a timberland owner proposes to carry out a project that would result in timberland being converted to a non-timber growing use, the owner must secure a TCP from CAL FIRE. The TCP formally recognizes and records the fact that timberland will be converted to another land use. Projects that would result in the conversion of less than three acres of timberland may qualify for an exemption from the requirement for a TCP.

UNIVERSITY OF CALIFORNIA

There are no UC regulations specifically related to agriculture, timberland, or forest resources that apply to the 2021 LRDP.

LOCAL

As noted in Section 3.0.1, "University of California Autonomy," UC Santa Cruz, a constitutionally created State entity, is not subject to municipal regulations of surrounding local governments for uses on property owned or controlled by UC Santa Cruz that are in furtherance of the university's educational purposes. However, UC Santa Cruz may consider, for coordination purposes, aspects of local plans and policies of the communities surrounding the campus when it is appropriate and feasible, but it is not bound by those plans and policies in its planning efforts.

County of Santa Cruz General Plan

The County of Santa Cruz General Plan contains the following objectives and policies related to agriculture and forestry resources in the County and that may be relevant to the 2021 LRDP:

Objective 5.13 Commercial Agricultural Land. To maintain for exclusive agricultural use those lands identified on the County Agricultural Resources Map as best suited to the commercial production of food, fiber and ornamental crops and livestock and to prevent conversion of commercial agricultural land to non-agricultural uses. To recognize that agriculture is a priority land use and to resolve policy conflicts in favor of preserving and promoting agriculture on designated commercial agricultural lands.

- ▶ **Policy 5.13.22. Conversion to Non-Agricultural Uses Near Urban Areas:** Prohibit the conversion of agricultural lands (changing the land use designation from Agriculture to non-agriculture uses) around the periphery of urban areas except where it can be demonstrated that the viability of existing agricultural use is already severely

limited by conflicts with the urban uses, where the conversion of land would complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development and where the conversion of such land would not impair the viability of other agricultural lands in the area. Within the Sphere of Influence of the City of Watsonville, no conversion of agricultural land is allowed which would adversely affect the city's General Plan affordable housing goals, unless determined to be of an overriding public benefit.

Objective 5.12 Timber Production. To encourage the orderly economic production of forest products on a sustained yield basis under high environmental standards, to protect the scenic and ecological values of forested areas, and to allow orderly timber production consistent with the least possible environmental impacts.

- ▶ **Policy 5.12.1. Designation of Timberlands:** Designate on the General Plan and Local Coastal Plan Resources Maps those timberlands which are devoted to and used for growing and harvesting timber and which are capable of producing an average annual volume of wood fiber of at least 15 cubic feet per acre.

City of Santa Cruz General Plan

The City of Santa Cruz General Plan contains the following policies related to agricultural resources within the city and that may be relevant to the 2021 LRDP:

- ▶ **Policy LU1.2:** Ensure that growth and development does not lead to the overdraft of any water source, the creation of unacceptable levels of air pollution, or the loss of prime agricultural land.
- ▶ **Policy LU2.3.5:** Support County policies and programs aimed at preserving agricultural and grazing uses within the Planning Area and on the North Coast.

3.2.2 Environmental Setting

FARMLAND CLASSIFICATION

The State of California maps and classifies farmland through the DOC FMMP. Classifications are based on a combination of physical and chemical characteristics of the soil and climate that determine the degree of suitability of the land for crop production. The classifications under the FMMP are as follows:

- ▶ Prime Farmland—land that has the best combination of features for the production of agricultural crops;
- ▶ Farmland of Statewide Importance—land other than Prime Farmland that has a good combination of physical and chemical features for the production of agricultural crops, but that has more limitations than Prime Farmland, such as greater slopes or less ability to store soil moisture;
- ▶ Unique Farmland—land of lesser quality soils used for the production of the State's leading agricultural cash crops;
- ▶ Farmland of Local Importance—land of importance to the local agricultural economy;
- ▶ Grazing Land—existing vegetation that is suitable for grazing;
- ▶ Urban and Built-Up Land—land occupied by structures in density of at least one dwelling unit per 1.5 acres;
- ▶ Land Committed to Nonagricultural Use—vacant areas, existing land that has a permanent commitment to development but has an existing land use of agricultural or grazing lands; and
- ▶ Other Land—land not included in any other mapping category, common examples of which include low-density rural developments, brush, timber, wetland, and vacant and nonagricultural land surrounded on all sides by urban development.

PRC Section 21060.1 and State CEQA Guidelines Appendix G, together, define "Important Farmland" as those lands classified by the DOC FMMP as Prime, Unique, or Farmland of Statewide Importance, and exclude grazing land. Local jurisdictions can further consider other classifications of farmland as important, and can also utilize an agricultural land evaluation and site assessment (LESA) model to determine farmland importance and impacts from conversion.

The Santa Cruz County (County) General Plan designates Commercial Agricultural (CA) land based on the criteria set forth in the General Plan and the LCP Land Use Plan. The lands designated as CA in the LRDP project area include Viable Agricultural Land within the Coastal Zone (AG-3) and Limited Agricultural Lands Experiencing Use Conflicts (AG-2D), as shown on Figure 3.2-1.

EXISTING AGRICULTURE

Agriculture plays an important role in the county, and represents a major economic sector. Regarding agricultural production in the county, as of 2018, the total gross production value of agricultural commodities was approximately \$683 million (Santa Cruz County Agricultural Commissioner 2018). The top revenue crops produced in the county include berries, vegetables, nursery stock, and cut flowers and cut greens. The county has approximately 13,437 acres of Prime Farmland, 2,335 acres of Farmland of Statewide Importance, and 3,521 acres of Unique Farmland (DOC 2016). The majority of the Important Farmland is located in the southeast portion of the county, in the Pajaro River Valley around Watsonville.

Main Residential Campus

As illustrated on Figure 3.2-1, of the approximately 2,040-acre on the main residential campus, approximately 20 acres are designated Important Farmland, including approximately 7 acres designated as Prime Farmland and approximately 13 acres designated as Unique Farmland. This Important Farmland aligns with the CASFS farm, located on approximately 30 acres on the lower campus, which is used for research, training, and teaching organic production methods. Approximately 556 acres of the main residential campus is designated as Grazing Land. The majority of this Grazing Land, approximately 450 acres, is located on the meadows and grasslands of the lower campus, including approximately 196 acres that are leased to a rancher for seasonal cattle grazing. The remainder of the designated Grazing Land (approximately 80 acres) is located in the far northwestern corner of the north campus in the Marshall Field area and approximately 26 acres within the central campus. Grazing provides vegetation management and fire hazard reduction benefits to the campus as well as habitat enhancement for native flora and fauna (including the federally endangered Ohlone tiger beetle). The remainder of the main residential campus includes approximately 1,011 acres designated Other Land, the designation used mainly for forested areas, the majority of which are in the north campus area (approximately 803 acres), but Other Land also aligns with the Arboretum & Botanic Garden in the lower campus. Finally, there are approximately 453 acres designated Urban and Built-Up Land (DOC 2016), which align with developed areas throughout the main residential campus (Figure 3.2-1).

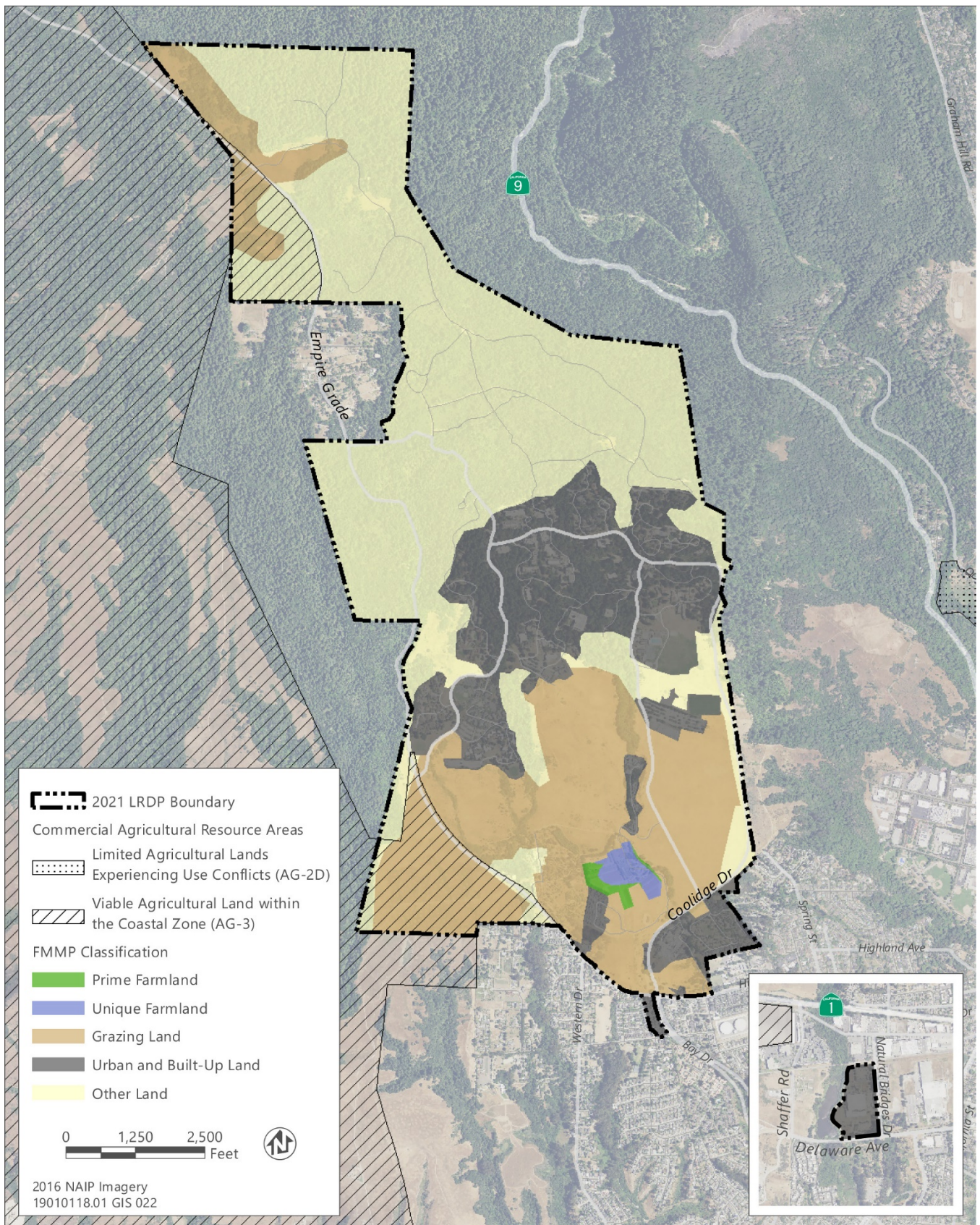
Westside Research Park

There is no Important Farmland or agricultural land on the Westside Research Park site, which is developed and as designated Urban and Built-Up Land (DOC 2016) (Figure 3.2-1).

Surrounding Lands

The County has designated lands within and adjacent to the northwestern and southwestern boundaries of the main residential campus, as well as in neighboring Wilder Ranch State Park, as Viable Agricultural Land within the Coastal Zone (AG-3) (Figure 3.2-1). This designation includes Commercial Agricultural Land in the county and all land restricted with a Williamson Act contract for Agricultural Preserve (Santa Cruz County 2020).

There are no designated agricultural lands within City of Santa Cruz limits or the City's existing Sphere of Influence. However, consistent with the County designation, the City's General Plan 2030 designates grazing land on the western edge of the city just south of the southwestern boundary of the UC Santa Cruz main residential campus as Agriculture/Grazing (AG). The City's AG designation is applied to areas used predominantly for large-scale agriculture or grazing, not community gardens or small-scale agricultural uses (City of Santa Cruz 2011, pgs. 39 and 43). Most of the City lands bordering this AG designation are within the City's protected greenbelt (Moore Creek Preserve), located north of the Westside Research Park.



Source: data downloaded from California Department of Conservation in 2019 for the year 2016 and Santa Cruz County in 2020 for the year 2019

Figure 3.2-1 Farmland

EXISTING FORESTRY RESOURCES

Forestry resources include forest land, timberland, and timberland production zones. Forest lands and timberland occupy a substantial portion of Santa Cruz County with large areas of timber production in the Santa Cruz Mountains. The Timber Production (TP) zoning district extends across approximately 71,000 acres of the county, primarily in the North Coast and Mountain Regions. The intent of the TP zoning district is to protect and maintain the county's larger tracks of timberland, and to preserve agriculture and other open space uses where they are compatible with timberland uses. Separate from the TP zoning district are areas identified by the County as "Timber Resources," which account for approximately 90,650 acres where timber may be grown and harvested if there are sufficient timber resources to meet minimum stocking standards (Santa Cruz County 2017). The total production value of timber resources for the county in 2018 was approximately \$10.2 million, an approximately 30 percent increase from 2017 (Santa Cruz County 2018).

Main Residential Campus

As illustrated in Figure 3.2-2, there are approximately 1,000 acres of forest lands on the main residential campus, including redwood forest, mixed evergreen forest, riparian woodland, coastal mixed hardwood, and coast live oak. Based on mapping provided by the Bay Area Open Space Council (2019), the majority of forest lands are located within the north campus area, totaling approximately 750 acres. There are approximately 185 acres of forest lands on the central campus and approximately 50 acres within the lower campus. In addition, the County has designated approximately 12 acres at the western boundary of the lower campus as timberland (Figure 3.2-2), and this area is associated with the timberland production zone to the west and northwest in Wilder Ranch State Park (Bay Area Open Space Council 2019 and Santa Cruz County 2020). The existing forest lands within the main residential campus are located either within existing open space natural reserve areas or retained as landscaping in and around structures.

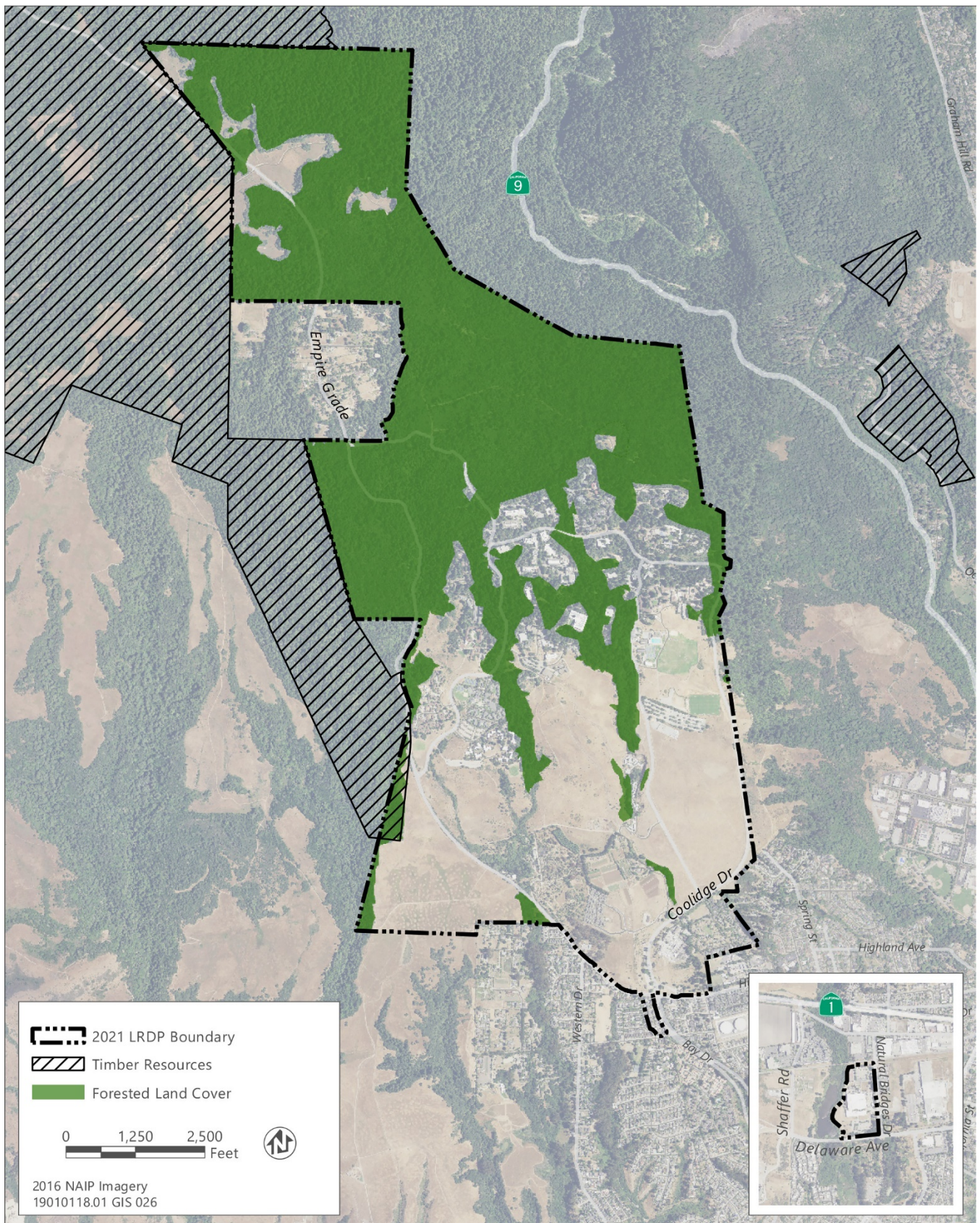
Westside Research Park

As shown in Figure 3.2-2, there is no forest land or timberland on the Westside Research Park site, which is designated Urban and Built-Up Land (DOC 2016).

Surrounding Lands

There are forest lands adjoining the main residential campus to the north, east, and west within the surrounding designated parks, open spaces, and recreational areas. These areas are designated by the FMMP as Other Land. In addition, there is County-designated timberland within Wilder Ranch State Park, directly west of the main residential campus.

The City of Santa Cruz is primarily developed, with open spaces within parks and City-owned greenbelt lands. There are no areas of protected timberland land within the City or its existing Sphere of Influence, and there are no protected timberlands within the City's General Plan 2030 planning area (City of Santa Cruz 2011).



Source: data downloaded from Bay Area Open Space Council in 2019 and Santa Cruz County in 2020; adapted by Ascent in 2020

Figure 3.2-2 Forest Resources

3.2.3 Environmental Impacts and Mitigation Measures

SIGNIFICANCE CRITERIA

Based on Appendix G of the State CEQA Guidelines, the 2021 LRDP would result in a potentially significant impact on agriculture and forest resources if it would:

- ▶ convert significant Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Important Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
- ▶ conflict with existing zoning for agricultural use, or a Williamson Act contract;
- ▶ conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g));
- ▶ result in the loss of forest land or conversion of forest land to a non-forest use; or
- ▶ involve other changes in the existing environment which, due to their location or nature, could result in conversion of Important Farmland, to non-agricultural use or conversion of forest land to non-forest use.

ANALYSIS METHODOLOGY

To evaluate the potential impacts of the 2021 LRDP on agriculture and forestry resources, the type and degree of Important Farmland and forestry resources that would be lost/converted were considered based on the FMMP and timberland designations within the LRDP area, the LESA model, and any policies and programs related to the preservation of agriculture and forest resources. The extent of Important Farmland and forest lands potentially affected by development on the main residential campus under the 2021 LRDP was determined based on GIS analysis, using mapping prepared by DOC, Bay Area Open Space Council, and Santa Cruz County, with adjustments (in the case of forest land) based on a review of aerial photography. Acreages of impact were estimated by overlaying 2021 LRDP development areas on the mapped FMMP designations and the mapped forested land cover and timber resources. In determining the level of significance, the analysis assumes that the project would comply with relevant State laws, regulations, and ordinances.

As described above, the LESA model was used to determine if the conversion of Important Farmland would be significant pursuant to PRC Section 21095. The LESA model is a point-based approach established by the DOC for rating the relative value of agricultural land resources. It is composed of six different factors: two Land Evaluation (LE) factors based upon measures of soil resource quality, and four Site Assessment (SA) factors that provide measures of a project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. The factors are weighted relative to one another and combined, resulting in a score that becomes the basis for a determination of a project's potential significance. Table 3.2-1 provides the LESA model scoring decision for determining if a project will result in a significant impact on agriculture.

Table 3.2-1 LESA Model Scoring Decision

Total LESA Score (points)	Scoring Decision
0 to 39	Not considered significant
40 to 59	Considered significant only if LE and SA sub-scores are each greater than or equal to 20 points
60 to 79	Considered significant unless either LE or SA sub-score is less than 20 points
80 to 100	Considered significant

Source: DOC 1997.

The Westside Research Park site, and adjacent lands, do not provide Important Farmland, agricultural land, or forest resources. Therefore, an evaluation of agriculture and forest resource impacts at the Westside Research Park is not required.

ISSUES NOT EVALUATED FURTHER

Conflict with Existing Zoning for Agricultural Use or Williamson Act Contract

The 2021 LRDP would result in land use changes only to land within the campus boundary, specifically the main residential campus and Westside Research Park. UC Santa Cruz, a constitutionally created State entity, is not subject to city or county zoning requirements within the campus boundary. Due to the specific tax-exempt status of the UC, land within the campus boundary is not subject to Williamson Act land use/tax contracts. As a result, no impacts to agricultural or timberland zoning would occur, and potential conflicts with existing agricultural or timberland zoning or with Williamson Act contracts are not evaluated further.

Indirect Conversion of Agriculture to Non-Agricultural Land Use or the Indirect Conversion of Forest Resources to Non-Forest Land Use

Indirect impacts on agriculture or forest resources would not occur due to campus development under the 2021 LRDP because, as stated above, the 2021 LRDP would not result in development adjacent to off-site agriculture or forest lands. Therefore, potential land use conflicts or associated pressure to convert neighboring agriculture or forest land to development would not occur due to the 2021 LRDP. No impacts related to indirect conversion of agriculture or forest resources would occur and these issues are not evaluated further.

As noted above, no areas within the 2021 LRDP boundaries are under Williamson Act contracts. Further, no lands adjacent to campus are under current Williamson Act contracts. Therefore, no impacts would occur to designated Williamson Act lands. Potential direct and indirect conflicts with Williamson Act contracts are not evaluated further.

IMPACTS AND MITIGATION MEASURES

Impact 3.2-1: Convert Lands Designated as Important Farmlands to Non-Agricultural Use

Implementation of the 2021 LRDP would result in the conversion of approximately 2 acres of land designated Prime Farmland on the California Department of Conservation's Farmland Mapping to non-agricultural uses. However, based on the Department of Conservation's Land Evaluation & Site Assessment (LESA) model, the 2-acre area is not considered a significant agricultural resource. In addition, the 2021 LRDP would result in the conversion of approximately 64 acres of grazing land to non-agricultural uses; however, grazing land is not considered Important Farmland and therefore its conversion to other land uses does not represent a significant environmental impact to agriculture. Therefore, the project's impact to Important Farmland is considered **less than significant**.

Approximately 20 acres of the main residential campus are designated Important Farmland, including approximately 7 acres designated as Prime Farmland, approximately 13 acres designated as Unique Farmland per the DOC FMMP (Figure 3.2-1). The 2021 LRDP land use plan designates the majority of these 20 acres of Important Farmland as Outdoor Research (see Figure 2-4) for the CASFS farm, located on approximately 30 acres in the lower campus. The extent of land use to support the CASFS program in the 2021 LRDP is the same as in the 2005 LRDP and would ensure that the farm remains in agricultural use through 2040. Nonetheless, implementation of the 2021 LRDP would result in the conversion of 2 acres of land designated as Prime Farmland to non-agricultural use as a result of the development of additional new employee housing south of the CASFS farm and east of the Ranch View Terrace employee housing (Figure 3.2-2). The 2 acres includes a vegetated buffer area that screens the Ranch View Terrace employee housing from the farm to the north. Although development within this buffer area is not anticipated, for a conservative evaluation, this area is included in the impact evaluation.

Based on the LESA model evaluation conducted for the 2-acre area, the conversion of the designated Prime Farmland to non-agricultural use would not be considered significant. The total LESA score for the 2-acre area is 46.4 points (LE factors sub-score of 38.9 and SA factors sub-score of 7.5). As shown in Table 3.2-1, above, this LESA model score is only considered significant if both the LE and SA sub-scores are each equal to or greater than 20. In this case, only the LE score (38.9) exceeds the threshold of 20 while the SA (7.5) score is well under the threshold (see Appendix C for the detailed LESA evaluation worksheet) (DOC 1997). Therefore, based on the LESA score, the 2-acre area is not considered to represent a significant agricultural resource and its conversion to other land uses does not represent a significant environmental impact to agriculture. Further, as the land is isolated with respect to farmland in the region and is not considered a significant agricultural resource, the conversion of this area is not considered inconsistent with local policy direction related to the loss of agricultural land in instances where the conversion would not affect the viability of other agricultural land in the area. Therefore, the 2021 LRDP impact to Important Farmland is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 3.2-2: Result in a Loss or Conversion of Forest Land to Non-Forest Use

Implementation of the 2021 LRDP would result in the development of approximately 123 acres (of the approximately 1,000 acres within the LRDP area) of forested land cover, which would result in removal of trees that may be harvested for sale. Prior to tree removal, UC Santa Cruz would be required to secure TCPs for conversion of timberland to another use and receive approval of THPs if commercial trees are harvested. In addition to compliance with the Forest Practice Rules through THPs and TCPs, as necessary, UC Santa Cruz would retain an estimated 10 percent or greater tree cover throughout each development area, similar to historic development on-campus, such that each development area would still be considered forest land and would continue to provide forest land public benefits such as aesthetics, biodiversity, water quality, and recreation. Therefore, the project's forest resource impact is considered **less than significant**.

As illustrated in Figure 3.2-2, there are approximately 1,000 acres of forested land cover on the main residential campus, which meets the definition of forest lands per PRC Section 12220(g). The forested land cover includes redwood forest, mixed evergreen forest, riparian woodland, coastal mixed hardwood, and coast live oak. The majority of forest lands are located within the north campus area, totaling approximately 750 acres. There are approximately 185 acres of forest lands on the central campus and approximately 50 acres within the lower campus. In addition, approximately 12 acres at the western boundary of the lower campus is designated as timberland by Santa Cruz County associated with the timberland production zone to the west and northwest in Wilder Ranch State Park. Implementation of the 2021 LRDP would have no impact on the 12 acres of timberland at the western boundary of the lower campus. However, the 2021 LRDP development areas would impact approximately 123 acres of forest lands, including approximately 64 acres on the north campus, approximately 56 acres on the central campus, and approximately 2 acres on the lower campus.

Development under the 2021 LRDP would preserve as many healthy trees as possible, but would require removal of existing trees in the footprints of proposed buildings, facilities, and infrastructure. Trees in poor condition would be removed before healthy trees in these areas. Development may also require removal or pruning of trees within 10 feet of existing buildings to accommodate renovation and rehabilitation activities. Although the campus does not grow commercial timber, the definition of timber under PRC Section 4526 classifies trees growing within the LRDP boundaries, such as redwoods, as commercial species trees.

CAL FIRE is the enforcing agency responsible for ensuring that logging and other forest harvesting activities are conducted in a manner that preserve and protect fish, wildlife, forests, and streams. UC Santa Cruz would prepare, submit, and get approval of a THP through CAL FIRE. The THP would likely address a group projects in proximity to each other within a geographical area/watershed. The THP outlines the timber proposed for commercial harvesting, the methods of harvesting, and the steps that will be taken to prevent damage to the environment. THPs are required to be prepared by a Registered Professional Forester. The THP is intended to provide information for CAL FIRE to determine if the proposed logging conforms to the Forest Practice Rules and to provide direction to the logging

operator who will carry out the THP. The THP documents are certified as the “functional equivalent” of an EIR to comply with CEQA; the THP evaluates the potential direct and cumulative impacts that might occur as a result of the logging plan and requires feasible measures to reduce impacts to a level of insignificance. The Forest Practice Rules state that CAL FIRE “shall disapprove a plan as not conforming to the rules” if it does not contain enough information to evaluate potential environmental effects, if it would cause “significant, long-term damage” or cause a “taking” of a threatened or endangered species, or if it would cause irreparable harm to rare or endangered plant species (see CCR Title 14, Section 898.2). After review and approval of a THP, CAL FIRE inspectors would periodically inspect the logging operation to ensure compliance with the THP and all laws and regulations. The THP is valid for five years, with an allowance for two 1-year extensions, which results in permit coverage for up to seven years. When a THP operation has been completed, UC Santa Cruz must submit a completion report to CAL FIRE, which then inspects the area to certify compliance with all requirements.

In addition, when development pursuant to the 2021 LRDP would result in timberland being converted to a non-timber growing use, UC Santa Cruz must secure a TCP from CAL FIRE. The TCP formally recognizes and records the fact that timberland will be converted to another land use. The TCP could be prepared for the overall 2021 LRDP or phased as sufficient timberland conversion information is available for projects to be implemented under the 2021 LRDP. CAL FIRE approval of the TCP(s) is based on findings that (1) the conversion would be in the public interest; (2) the conversion would not have a substantial and unmitigated adverse effect upon continued timberland within one mile; (3) the soils, slopes, and watershed conditions would be suitable for the conversion; and (4) there is not proximate and suitable land not zoned as timberland that would be suitable for the development. The 2021 LRDP is a campuswide plan for a public university and as such is considered to be in the public interest. In addition, the potential conversion of timberland would not affect such lands outside of campus and would occur only in areas suitable for campus development. Lastly, none of the land that is envisioned for development under the 2021 LRDP has been officially designated/zoned as timberland. This 2021 LRDP EIR addresses the environmental impacts of implementation of the 2021 LRDP and discloses and evaluates alternatives, which would support the preparation of TCP(s) for 2021 LRDP development to support CAL FIRE findings.

In addition to compliance with the Forest Practice Rules through THPs and TCPs, as necessary, UC Santa Cruz would retain an estimated 10 percent or greater tree cover at a given development site such that the project sites would still be considered forest land per PRC Section 12220(g). Maintaining at least 10 percent forested land cover would continue to provide public benefits such as aesthetics, biodiversity, water quality, and recreation, which are essential to UC Santa Cruz’s objectives for the 2021 LRDP and would be consistent with local policy direction of the surrounding county. Because forest land cover would be maintained and because timber harvest and conversion would be implemented in compliance with regulations that are protective of the environment, the 2021 LRDP impact to forest resources is considered **less than significant**.

Mitigation Measures

No mitigation is required.