

3.3 AGRICULTURE AND FORESTRY RESOURCES

3.3.1 Introduction

This section evaluates the potential effects of the proposed Plan on agriculture and forestry land uses in the Bay Area. It describes trends in land use and physical development regarding agriculture and forestry lands. The impact analysis addresses the potential for physical disruption to agricultural lands or forestlands.

Comment letters received in response to the Notice of Preparation (NOP) included requests for consideration of planned rural development; the Delta Plan; and loss of pervious surfaces. Project elements, such as land use strategies to address development in rural and wildland-urban interface lands, are addressed in Chapter 2, “Project Description.”

Consistency with natural community conservation plans and habitat conservation plans is addressed in Section 3.5, “Biological Resources.” Consistency with open space protection plans and policies is addressed in Section 3.11, “Land Use, Population, and Housing.” Potential impacts on open space parks and recreation are described in Section 3.13, “Public Services and Recreation.”

The CEQA Guidelines note that comments received during the NOP scoping process can be helpful in “identifying the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in an EIR and in eliminating from detailed study issues found not to be important” (CEQA Guidelines Section 15083). Neither the CEQA Guidelines nor Statutes require a lead agency to respond directly to comments received in response to the NOP, but they do require that they be considered. Consistent with these requirements, the comments received in response to the NOP have been carefully reviewed and considered by MTC and ABAG in the preparation of the impact analysis in this section. Appendix B includes all NOP comments received.

3.3.2 Environmental Setting

PHYSICAL SETTING

Land Use Patterns

The pattern of land uses in the Bay Area includes a mix of open space, agriculture, developed urban centers, a variety of suburban commercial and residential areas, and scattered older towns. This pattern reflects the landforms that physically define the region: the bay, rivers, and valleys. The land uses surrounding the bay margins tend to be more intensely developed, particularly from San Francisco south along the peninsula to Santa Clara County and from Contra Costa County south through Alameda County to Santa Clara County. These areas also include extensive networks of open space. The counties north of the bay (Marin, Sonoma, and Napa) are more sparsely developed with a combination of suburban development, smaller cities and towns, and agriculture. Other areas of the Bay Area, such as the East Bay (away from the bay margins) and Solano County further to the east, tend to be more suburban in character, with heavy industry related to oil refineries dotting the landscape, as well as large swaths of agriculture. These general characterizations do not capture all the land use types and patterns associated with the nine counties and 101 cities that make up the Plan area.

Extent of Urban Development

According to the most recent data (available from 2018 and 2020), approximately 18 percent of the region's approximately 4.4 million land acres were considered to be urban built-up land according to the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) (DOC 2018; Bay Area Open Space Council 2019). The remaining undeveloped area includes open space, forestry, and agricultural lands, as well as water bodies (excluding the San Francisco Bay) and parks. Approximately 29 percent of the region is identified as protected open space (Bay Area Open Space Council 2019). The amount of urban built-up land according to the FMMP, in each of the nine counties, varies from a low of 5 percent in Napa County to a high of 80 percent in San Francisco (DOC 2018, see Table 1.2-9). The Bay Area includes 101 cities, with San Jose, San Francisco, and Oakland representing the largest urbanized centers. Other major urban centers have formed throughout the region, leading to a pattern of urban land and open space. More information on urban land uses is presented in Section 3.11, "Land Use, Population, and Housing."

AGRICULTURAL LAND

Current and Historical Agricultural Uses

The Bay Area has a substantial amount of land in agricultural uses. In 2018, over half of the region's approximately 4.4 million land acres were zoned for agricultural uses or classified as agricultural land, as defined by the FMMP (DOC 2018). Of these approximately 2.3 million acres of agricultural land, over 70 percent (about 1.7 million acres) are used for grazing. Products grown in the Bay Area include field crops, fruit and nut crops, seed crops, vegetable crops, and nursery products. Field crops, which include corn, wheat, and oats, as well as pasturelands, represent approximately 62 percent of Bay Area agricultural land (DOC 2018; U.S. Department of Agriculture 2017).

Table 3.3-1 shows the acres of agricultural lands, by farmland type, for each county in the region, excluding San Francisco County. **Figure 3.3-1** shows the location of these agricultural lands within the region. The classification of agricultural lands is based primarily on soils and climate, although Prime Farmland, Farmland of Statewide Importance, and Unique Farmland must have been used for agricultural production at some time during the previous 4 years. When new data are released, map reviewers, including city and county planning departments, are notified of their availability. Maps prepared under the FMMP are reviewed at the local level for accuracy of land use classification and delineation. For more information about farmland classification, see the discussion in Section 3.3.3, "Regulatory Setting," below.

Table 3.3-1: Bay Area Agricultural Lands

	Alameda	Contra Costa	Marin	Napa	San Mateo	Santa Clara	Solano	Sonoma	Region
Prime Farmland	3,400	26,200	<1	30,600	1,700	14,800	130,700	29,800	237,300
Farmland of Statewide Importance	1,100	7,700	140	9,600	130	3,300	6,700	17,500	46,100
Unique Farmland	2,200	3,400	280	16,800	2,100	2,200	10,200	34,000	71,100
Farmland of Local Importance	50	60,300	62,700	18,300	700	5,600	<1	79,700	227,300
Farmland Subtotal	6,700	97,600	63,100	75,200	4,700	26,000	147,600	161,000	581,000
Grazing Land	240,900	157,700	89,000	177,800	49,100	393,000	207,300	414,600	1,729,000
Regional Total	247,600	255,100	152,100	253,000	53,800	418,900	354,800	575,600	2,311,000

Notes: Numbers less than 1 are shown as "<1"; whole numbers have been rounded (between 11 and 999 to the nearest 10, between 1,000 and 1,000,000 to the nearest 100, above 1,000,000 to the nearest 1,000). Figures may not sum because of independent rounding.

Prime = farmland with the best combination of physical and chemical features able to sustain long term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields.

Statewide Importance = similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store moisture.

Unique = farmland of lesser quality soils used for the production of the State's leading agricultural crops. This land is usually irrigated but may include nonirrigated orchards or vineyards.

Local Importance = important to the local agricultural economy as determined by the county's board of supervisors and local advisory committee.

Grazing = land on which the existing vegetation is suited to the grazing of livestock.

Farmland is defined in Appendix G of the CEQA Guidelines as Prime Farmland, Farmland of Statewide Importance, and Unique Farmland.

Source: DOC 2018

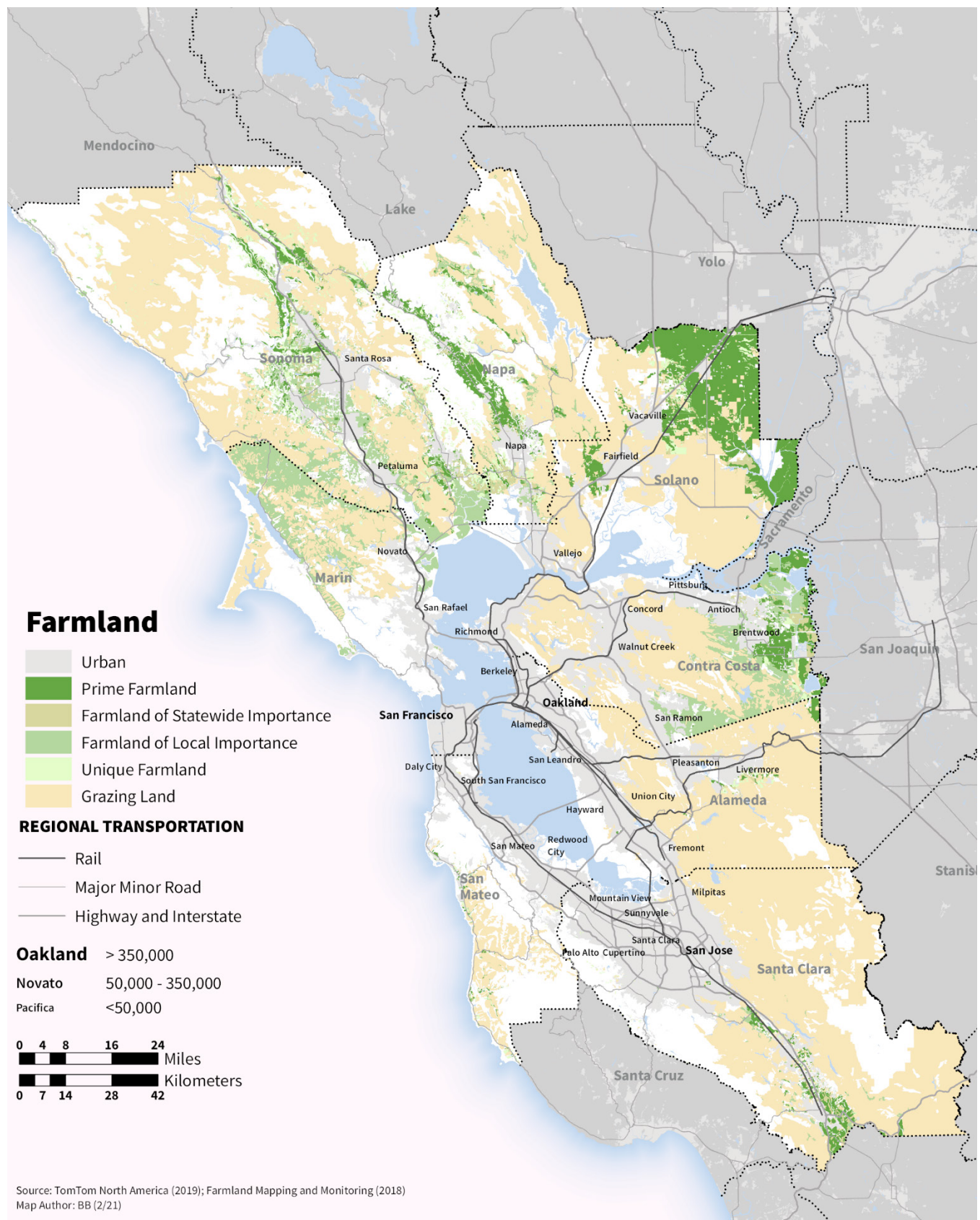


Figure 3.3-1: Agricultural Lands

Table 3.3-2 shows the acres of land zoned for agricultural uses for each county. Regionally, there is little difference between the acres of land zoned for agricultural uses and acres of land classified as agricultural as defined by the FMMP; however, these differences are more pronounced at the county level.

Table 3.3-2: Bay Area Agricultural Zoning

	Alameda	Contra Costa	Marin	Napa	San Mateo	Santa Clara	Solano	Sonoma	Regional Total
Agricultural Lands (FMMP)	247,600	255,100	152,100	253,000	53,800	418,900	354,800	575,600	2,311,000
Agricultural Zoning (Cities/Counties)	255,200	236,900	151,300	453,500	66,300	447,800	333,300	347,900	2,292,000

Note: Whole numbers have been rounded (between 1,000 and 1,000,000 to the nearest 100, above 1,000,000 to the nearest 1,000). Figures may not sum because of independent rounding.

Sources: Compiled by MTC/ABAG based on data from Bay Area Local Jurisdictions 2020 and DOC 2018

Williamson Act Lands

In 1965, the State Legislature passed the California Land Conservation Act (better known as the Williamson Act) in response to agricultural property tax burdens resulting from rapid land value appreciation. Rapidly rising property taxes, resulting from nearby urbanization, made agricultural uses increasingly less economically viable. See the discussion in Section 3.3.3, “Regulatory Setting,” for a comprehensive description of the Williamson Act.

Agricultural land under Williamson Act contract includes both “prime” and “nonprime” lands. The California Land Conservation Act defines prime agricultural land as (1) U.S. Department of Agriculture (USDA) Class I or II soils; (2) land with a Storie Index soil rating of 80–100; (3) land that has returned a predetermined annual gross value for 3 of the past 5 years; (4) livestock-supporting land with a carrying capacity of at least one animal unit per acre; or (5) land planted with fruit or nut trees, vines, bushes, or crops that have a nonbearing period of less than 5 years and that will normally return a predetermined annual gross value per acre per year during the commercial bearing period (Government Code Sections 51200–51207). Nonprime lands include pasture and grazing lands and other non-irrigated agricultural land with lesser-quality soils. Prime agricultural lands under the Williamson Act are defined differently from Prime Farmland under the FMMP, as outlined above.

In 2018, approximately 1.2 million acres of land were under Williamson Act contract in the Bay Area. Of the total acres, 17 percent were designated as prime farmland, and 83 percent were nonprime (DOC 2018). This indicates that lands under Williamson Act contract in the Bay Area are primarily used for pasture and grazing and not for the cultivation of crops. **Table 3.3-3** shows the number of acres of land under Williamson Act contracts in the Bay Area as of 2020, and Williamson Act lands are shown in **Figure 3.3-2**.

Table 3.3-3: Land under Williamson Act Contracts in the Bay Area (2016-2020)

	Total Acres	Share Prime Acres	Share Nonprime Acres
Alameda	145,600	2%	98%
Contra Costa	40,700	21%	79%
Marin	80,100	0%	100%
Napa	82,500	27%	73%
San Francisco	0	0	0
San Mateo	44,000	n/a	n/a
Santa Clara	236,800	3%	97%
Solano	261,900	45%	55%
Sonoma	290,400	16%	84%
Region Total	1,182,000	17%	83%

Note: Whole numbers have been rounded (between 0 and 10 to the nearest whole number, between 11 and 999 to the nearest 10, between 1,000 and 1,000,000 to the nearest 100, above 1,000,000 to the nearest 1,000). Figures may not sum because of independent rounding.

Sources: Compiled by MTC and ABAG in 2021

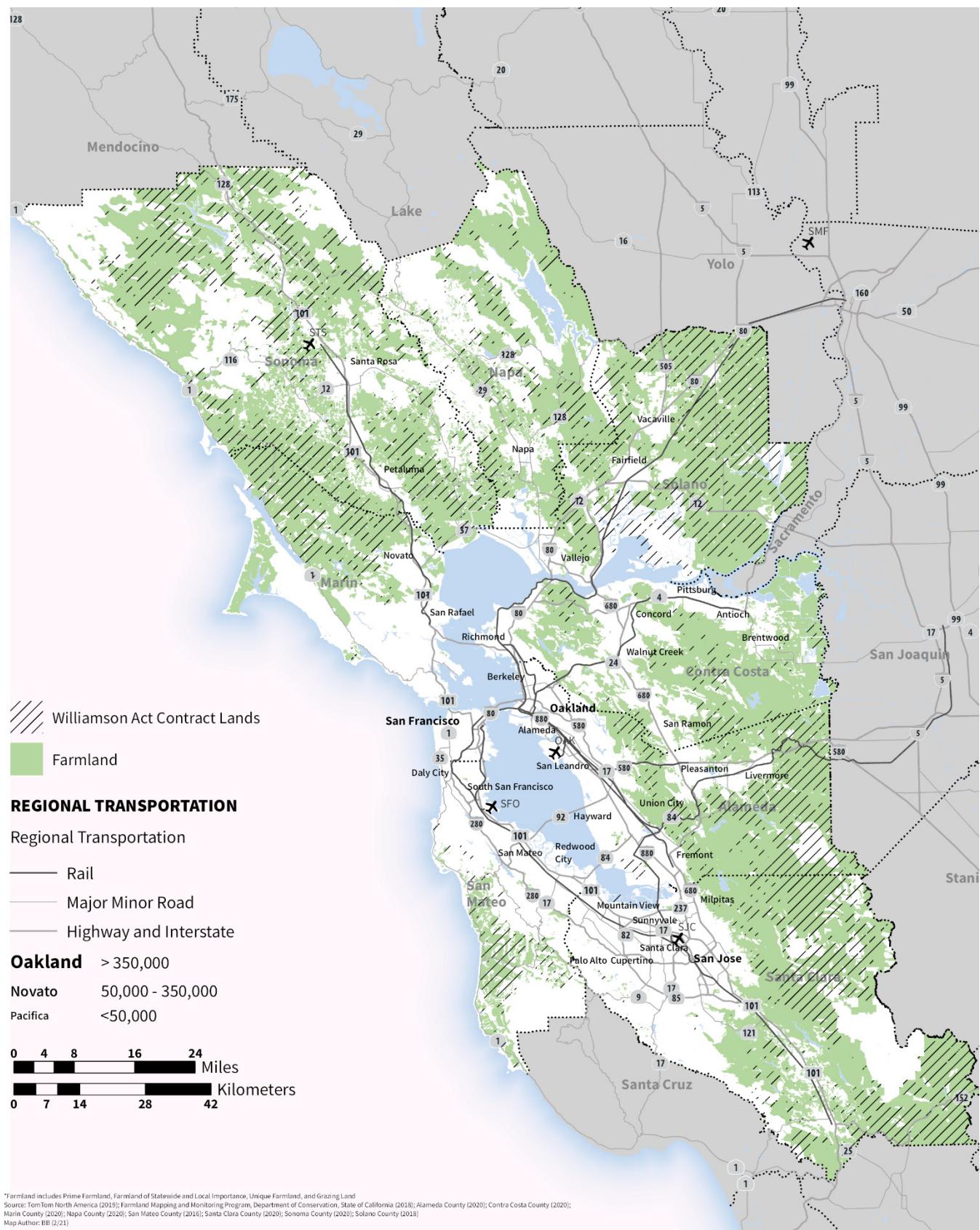


Figure 3.3-2: Williamson Act Lands

Forests

The Bay Area includes a variety of forest types spread throughout the nine-county region. Forests are generally located at higher elevations of the Coast Ranges in areas with sufficient moisture. Forestland is a valuable environmental and aesthetic resource and a defining feature in many parts of the landscape in the Bay Area. Forest habitats include a wide range of woodland and forest species. In the Bay Area, only Napa (59,100 acres), Sonoma (319,700 acres), San Mateo (45,600 acres), and Santa Clara (28,500) Counties have substantial acreages of unreserved timberland forest (U.S. Department of Agriculture 2016). For a comprehensive description of specific forest types and species, please refer to Section 3.5, “Biological Resources.”

Priority Conservation Areas

The proposed Plan’s core strategy is “focused growth” in existing communities along the existing transportation network. This strategy helps to achieve key regional economic, environmental, and equity goals: It builds upon existing community characteristics, efficiently leverages existing infrastructure, and mitigates impacts on areas with less development. Priority Conservation Areas (PCAs), which are identified, recommended, and approved by local governments, are key to implementing the “focused growth” strategy.

PCAs are open spaces that provide agricultural, natural resource, scenic, recreational, and/or ecological values and ecosystem functions. These areas are identified through consensus by local jurisdictions and park/open space districts as lands in need of protection because of pressure from urban development or other factors. PCAs are categorized into four designations: Natural Landscapes, Agricultural Lands, Urban Greening and Regional Recreation. There are 184 PCAs within the region.

3.3.3 Regulatory Setting

FEDERAL REGULATIONS

Farmland Protection Program

The U.S. Natural Resources Conservation Service (NRCS) maps soils and farmland uses to provide comprehensive information necessary for understanding, managing, conserving, and sustaining the nation’s limited soil resources. In addition to many other natural resource conservation programs, NRCS manages the Farmland Protection Program, which provides funds to help purchase development rights to keep productive farmland in agricultural uses. Working through existing programs, USDA joins with State, tribal, or local governments to acquire conservation easements or other interests from landowners.

Agricultural Improvement Act of 2018

The Agricultural Improvement Act of 2018, or 2018 Farm Bill, which was signed on December 20, 2018 (and will remain in effect through 2023), builds upon and continues to implement many of the crucial programs that serve agricultural producers. The U.S. Department of Agriculture is charged with implementing the bill, which reauthorized previous programs in the 2014 Farm Bill to serve producers now while they seek public input for future programs. The 2018 Farm Bill continued funding for major programs but did include some changes to Natural Resources Conservation Programs such as expanding support to producers who address significant natural resources concerns through adoption of conservation practices and activities. All major conservation programs are continued, although some have been modified.

Federal Farmland Protection Policy Act

NRCS oversees the Farmland Protection Policy Act (FPPA) (7 U.S. Code [USC] Section 4201 et seq.; see also 7 CFR 658). The FPPA (a subtitle of the 1981 Farm Bill) is national legislation designed to protect farmland. The FPPA states that its purpose is to “minimize the extent to which federal programs contribute to the unnecessary conversion of farmland to nonagricultural uses.” The FPPA applies to projects and programs that are sponsored or financed in whole or in part by the federal government. It does not apply to private construction projects subject to federal permitting and licensing, projects planned and completed without assistance from a federal agency, federal projects related to national defense during a national emergency, or projects proposed on land already committed to urban development. The FPPA spells out requirements to ensure that federal programs are compatible with State, local, and private programs and policies to protect farmland, to the extent practical, and calls for the use of the Land Evaluation and Site Assessment system to aid in analysis. Because MTC or its project sponsors may ultimately seek some federal funding for transportation projects, the FPPA is applicable to the proposed Plan.

Federal Forest Legacy Program

The Federal Forest Legacy Program was a part of the 1990 Farm Bill. Its purpose is to identify and protect environmentally important forestlands that are threatened by present or future conversion to non-forest uses. The program provides conservation easements and gives priority to lands that can be effectively protected and managed, as well as lands that have significant scenic, recreational, timber, riparian, fish and wildlife, threatened and endangered species, and other cultural or environmental values. Properties that are “working forests,” whereby the forestland is managed for the production of forest products, are also eligible under this program. Involvement in this program by private landowners is voluntary.

Federal Environmental Quality Incentives Program

The Environmental Quality Incentives Program is a voluntary program that provides financial and technical assistance through contracts up to 10 years in length to farmers and ranchers who face threats to soil, water, air, and related natural resources on their land. These contracts provide financial assistance to help plan and implement conservation practices that address natural resource concerns and for opportunities to improve soil, water, plant, animal, air and related resources on agricultural land and non-industrial private forestland. In addition, another purpose of the program is to help producers meet federal, State, Tribal and local environmental regulations.

STATE REGULATIONS**Sustainable Communities and Climate Protection Act of 2008**

Senate Bill 375 (SB 375) (Chapter 728, Statutes of 2008) focuses on aligning transportation, housing, and other land uses to achieve regional greenhouse gas (GHG) emission reduction targets established under the California Global Warming Solutions Act, also known as Assembly Bill 32 (AB 32). SB 375 requires California Metropolitan Planning Organizations to develop an SCS as part of the RTP, with the purpose of identifying policies and strategies to reduce per capita passenger vehicle-generated GHG emissions. The SCS must:

- ▲ identify the general location of land uses, residential densities, and building intensities within the region;
- ▲ identify areas within the region sufficient to house all the population of the region;

- ▲ identify areas within the region sufficient to house an 8-year projection of the regional housing need;
- ▲ identify a transportation network to service the regional transportation needs;
- ▲ gather and consider the best practically available scientific information regarding resource areas and farmland in the region; and
- ▲ consider the State housing goals, set forth a forecasted development pattern for the region, and allow the RTP to comply with the federal Clean Air Act of 1970 (42 USC Section 7401 et seq.).

The development pattern in the SCS, when integrated with the transportation network and other transportation measures and policies, must reduce the GHG emissions from automobiles and light-duty trucks to achieve the GHG emission reduction targets approved by the California Air Resources Board (CARB). If the SCS does not achieve the GHG emission targets set by CARB, an Alternative Planning Strategy must be developed to demonstrate how the targets could be achieved.

SB 375 also imposes a number of new requirements on the regional housing needs process. Before SB 375, the RTP and regional housing needs processes were not required to be coordinated. SB 375 now synchronizes the schedules of the Regional Housing Need Allocation (RHNA) and RTP processes. The RHNA, which is developed after the RTP, must also allocate housing units within the region consistent with the development pattern included in the SCS. Previously, the RHNA determination was based on population projections produced by the California Department of Finance (Finance). SB 375 requires the determination to be based upon population projections by Finance and regional population forecasts used in preparing the RTP. If the total regional population forecasted and used in the RTP is within a range of 3 percent of the regional population forecast completed by Finance for the same planning period, then the population forecast developed by the regional agency and used in the RTP shall be the basis for the determination. If the difference is greater than 3 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by Finance.

The Delta Protection Act of 1992

The Delta Protection Act of 1992 established the Delta Protection Commission, a State entity to plan for and guide the conservation and enhancement of the natural resources of the Sacramento–San Joaquin Delta (Delta) while sustaining agriculture and meeting increased recreational demand. The act defines a Primary Zone, which comprises the principal jurisdiction of the Delta Protection Commission. The Secondary Zone is the area outside the Primary Zone and within the “Legal Delta”; the Secondary Zone is not within the planning area of the Delta Protection Commission. Portions of Alameda, Contra Costa, and Solano Counties overlap with the Primary Zone. The act requires the Delta Protection Commission to prepare and adopt a land use and resource management plan for the Primary Zone of the Delta, which must meet specific goals.

Sacramento-San Joaquin Delta Reform Act of 2009

The Delta Plan, required by the 2009 Sacramento-San Joaquin Delta Reform Act, creates rules and recommendations to further the State’s coequal goals for the Delta: improve Statewide water supply reliability and protect and restore a vibrant and healthy Delta ecosystem. The plan provides that the goals can be achieved all in a manner that preserves, protects, and enhances the Delta’s unique agricultural, cultural, and recreational characteristics. Specific to agricultural land use, one of the five core strategies of the Delta Stewardship Council is to “maintain Delta agriculture as primary land use,

food source, a key economic sector, and a way of life.” The plan includes specific policies for the protection and promotion of agriculture, such as those that call for wise location of new urban development, promotion of value-added crop processing, agritourism encouragement, wildlife-friendly farming.

California Land Conservation Act

The California Land Conservation Act (Government Code Section 51200 et seq.) of 1965, commonly known as the Williamson Act, provides a tax incentive for the voluntary enrollment of agricultural and open space lands in contracts between local government and landowners. The act allows local governments to assess agricultural land based on the income-producing value of the property rather than the “highest and best use” value, which had previously been the rule. The contract enforceably restricts the land to agricultural and open space uses and compatible uses defined in State law and local ordinances. An agricultural preserve, which is established by local government, defines the boundary of an area within which a city or county will enter into contracts with landowners. Local governments calculate the property tax assessment based on the actual use of the land instead of the potential land value assuming full development.

Terms of Williamson Act contracts are 10 years and longer. The contract is automatically renewed each year, maintaining a constant, 10-year contract, unless the landowner or local government files to initiate nonrenewal. A “notice of nonrenewal” starts the 9-year nonrenewal period. During the nonrenewal process, the annual tax assessment gradually increases. At the end of the 9-year nonrenewal period, the contract is terminated. Only a landowner can petition for a contract cancellation. Tentative contract cancellations can be approved only after a local government makes specific findings and determines that the cancellation fee has been paid by the landowner.

The State of California has the following policies regarding public acquisition of, and locating public improvements on lands in, agricultural preserves and on lands under Williamson Act contracts (Government Code Sections 51290–51295):

- ▲ State policy is to avoid locating federal, State, or local public improvements and improvements of public utilities, and the acquisition of land, in agricultural preserves.
- ▲ State policy is to locate public improvements that are in agricultural preserves on land other than land under Williamson Act contract.
- ▲ State policy is that any agency or entity proposing to locate such an improvement, in considering the relative costs of parcels of land and the development of improvements, give consideration to the value to the public of land, particularly prime agricultural land, in an agricultural preserve.

In 1998, another option in the Williamson Act Program was established with the creation of Farmland Security Zone contracts. A Farmland Security Zone is an area created within an agricultural preserve by a board of supervisors upon the request of a landowner or group of landowners. Farmland Security Zone contracts offer landowners greater property tax reduction and have a minimum initial term of 20 years. Like Williamson Act contracts, Farmland Security Zone contracts renew annually unless a notice of nonrenewal is filed.

State funding was provided in 1971 by the Open Space Subvention Act, which created a formula for allocating annual payments to local governments based on acreage enrolled in the Williamson Act Program. Subvention payments were made through fiscal year 2009 but have been eliminated by the State since that time because of revenue shortfalls. This action affected local support for the

Williamson Act because it shifted the burden of the tax revenue reductions to counties. As a result, this tool for farmland conservation, although still used, was significantly weakened.

Assembly Bill 1265 of 2011

AB 1265 (Chapter 90, Statutes of 2011) was approved in summer 2011 and reinstated parts of the Williamson Act, Revenue and Tax Code, and Open Space Subvention Act that allowed eligible counties to recapture 10 percent of the property tax benefits provided to their owners of Williamson Act lands by decreasing the duration of the Land Conservation Act and Farmland Security Zone contracts by 1 and 2 years, respectively. SB 1353 (Chapter 322, Statutes of 2014), approved by the governor on September 15, 2014, eliminated the January 1, 2016, sunset clause and made the option for participating counties to recapture portions of foregone tax revenue permanent.

California Farmland Conservancy Program

The California Farmland Conservancy Program (PRC Section 10200 et seq.) supports the voluntary granting of agricultural conservation easements from landowners to qualified nonprofit organizations, such as land trusts, as well as local governments. Conservation easements are voluntarily established restrictions that are permanently attached to property deeds, with the general purpose of retaining land in its natural, open space, agricultural, or other condition while preventing uses that are deemed inconsistent with the specific conservation purposes expressed in the easements. Agricultural conservation easements define conservation purposes that are tied to keeping land available for continued use as farmland. Such farmlands remain in private ownership, and the landowners retain all farmland use authority, but farm owners are restricted in their ability to subdivide or use the land for nonagricultural purposes, such as urban uses. Potential impacts on conservation easements would be addressed in subsequent project-level documents.

Farmland Mapping and Monitoring Program

The FMMP is the only Statewide land use inventory conducted on a regular basis. The California Department of Conservation administers the FMMP, pursuant to which it maintains an automated map and database system to record changes in the use of agricultural lands. Farmland under the FMMP is listed by category: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. The farmland categories listed under the FMMP are described below. The categories are defined pursuant to USDA land inventory and monitoring criteria, as modified for California.

Prime Farmland

Prime Farmland is land with the best combination of physical and chemical features to sustain long-term production of agricultural crops. These lands have the soil quality, growing season, and moisture supply necessary to produce sustained high yields. Soil must meet the physical and chemical criteria determined by NRCS. Prime Farmland must have been used for production of irrigated crops at some time during the 4 years before the mapping date by the FMMP.

Farmland of Statewide Importance

Farmland of Statewide Importance is similar to Prime Farmland but with minor differences, such as greater slopes or a lesser ability of the soil to store moisture. Farmland of Statewide Importance must have been used for production of irrigated crops at some time during the 4 years before the mapping date.

Unique Farmland

Unique Farmland has lesser-quality soils than Prime Farmland or Farmland of Statewide Importance. Unique Farmland is used for the production of the State's leading agricultural crops. These lands are usually irrigated but may include nonirrigated orchards or vineyards found in some climatic zones in California. Unique Farmland must have been used for crops at some time during the 4 years before the mapping date.

Farmland of Local Importance

Farmland of Local Importance is farmland that is important to the local agricultural community as determined by each county's board of supervisors and local advisory committees.

Right to Farm Act 1981

The Right to Farm Act (Civil Code Section 3482.5) is designed to protect commercial agricultural operations from nuisance complaints that may arise when an agricultural operation is conducting business in a "manner consistent with proper and accepted customs." The code specifies that established operations that have been in business for 3 or more years that were not nuisances at the time they began shall not be considered a nuisance as a result of new land use.

Sustainable Agricultural Lands Conservation Program

The Sustainable Agricultural Lands Conservation Program is a component of the Affordable Housing and Sustainable Communities Program, developed and implemented under the Greenhouse Gas Reduction Fund within the California Budget Act of 2014. The goal of the Affordable Housing and Sustainable Communities Program is to reduce GHG emissions through projects that implement land use, housing, transportation, and agricultural land preservation practices to support infill and compact development.

California Forest Legacy Program Act of 2007

The California Forest Legacy Program Act, similar to the Federal Forest Legacy Program, is a program of the California Department of Forestry and Fire Protection (CAL FIRE). The program provides conservation easements to environmentally sensitive forest areas that have environmental, aesthetic, or commodity value. Money from the program is obtained by gifts, donations, federal grants and loans, and other appropriate funding sources and from the sale of bonds pursuant to the Safe Neighborhood Parks, Clean Water, Clean Air, and Coastal Protection Bond Act of 2000. Participation in this program by landowners is entirely voluntary. This act 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."

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 Title 14, Chapters 4, 4.5, and 10). CAL FIRE enforces the laws that regulate logging on nonfederal 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 they 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]). Designation of land as a TPZ places a 10-year restriction on use of the land. This process replaced the previous process of designating agricultural preserves (through Williamson Act contracts) in 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 that 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 Air Resources Board Compliance Offset Protocol for U.S. Forest Projects

The Forest Protocol provides requirements and methods for quantifying the net climate benefits of activities that sequester carbon on forestland. The protocol provides offset project eligibility rules; methods to calculate an offset project's net effects on GHG emissions and removal of carbon dioxide from the atmosphere; procedures for assessing the risk that carbon sequestered by a project may be reversed (i.e., released back to the atmosphere); and approaches for long-term project monitoring and reporting. The protocol is designed to ensure that the net GHG reductions and GHG removal enhancements caused by an offset project are accounted for in a complete, consistent, transparent, accurate, and conservative manner and may therefore be reported as the basis for issuing CARB or registry offset credits. The protocol provides eligibility rules, methods to quantify GHG reductions, project-monitoring instructions, and procedures for reporting Offset Project Data Reports. Additionally, all offset projects must submit to independent verification by CARB-accredited verification bodies.

California Department of Forestry and Fire Protection

CAL FIRE enforces the laws that regulate logging on nonfederal lands in California. It also provides periodic assessments of forest resources within California as part of the Fire and Resource Assessment Program. *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 nonforest uses either by 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 for

harm to people and property. These areas, known as High Hazard Zones, are the areas prioritized for tree removal. Goals of the task force include increasing the rate of forest treatments and expanding 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.

REGIONAL AND LOCAL REGULATIONS

In accordance with Government Code Section 65584(a), ABAG, has been designated by the State and federal governments as the official comprehensive planning agency for the Bay Area. ABAG reviews projects of regional significance for consistency with regional plans. Plan Bay Area provides a policy guide for planning the region's housing, economic development, environmental quality, transportation, recreation, and health and safety.

One Bay Area Grant Program

MTC's One Bay Area Grant program (OBAG) is a funding approach that aligns MTC's investments with support for focused growth. Established in 2012, OBAG taps federal funds to maintain MTC's commitments to regional transportation priorities while also advancing the Bay Area's land use and housing goals. OBAG includes both a regional program and a county program that:

- ▲ targets project investments in Priority Development Areas and
- ▲ rewards cities and counties that approve new housing construction and accept allocations through the RHNA process.

Cities and counties can use these OBAG funds to invest in:

- ▲ local street and road maintenance,
- ▲ streetscape enhancements,
- ▲ bicycle and pedestrian improvements,
- ▲ transportation planning,
- ▲ Safe Routes to School projects, and
- ▲ PCAs.

MTC in late 2015 adopted a funding and policy framework for the second round of OBAG grants. Known as OBAG 2 for short, the second round of OBAG funding is projected to total about \$800 million to fund projects from 2017-18 through 2021-22.

California Government Code, Section 56000

Each county in California has a local agency formation commission (LAFCO), which is the agency that has the responsibility to create orderly local government boundaries, with the goals of encouraging the orderly formation of local governmental agencies and the preservation of open space lands and discouraging urban sprawl. LAFCOs are governed by Section 56000 of the California Government Code. This legislation sets the commission's powers and duties, procedures for establishing and changing governmental boundaries, and other Statewide policies that LAFCOs must consider while making their determinations. While LAFCOs have no direct land use power, their actions determine which local government will be responsible for planning new areas. LAFCOs address a wide range of boundary actions, including creation of spheres of influences for cities, adjustments to boundaries of special districts, annexations, incorporations, detachments of areas from cities, and dissolutions of cities.

City and County General Plans

The most comprehensive land use planning for the San Francisco Bay Area region is provided by city and county general plans, which local governments are required by State law (California Government Code Section 65300 et seq.) to prepare as a guide for future development. The general plan contains goals and policies concerning topics that are mandated by State law or that the jurisdiction has chosen to include. Required topics are land use, circulation, housing, conservation, open space, noise, and safety. Other topics that local governments frequently choose to address are public facilities, parks and recreation, community design, and/or growth management. City and county general plans must be consistent with each other. County general plans must cover areas not included by city general plans (i.e., unincorporated areas). Issues pertaining to land use are described in the land use element, issues pertaining to agricultural and forest resources are described in the conservation element, and issues pertaining to open space are described in the open space element of general plans.

City and County Zoning

The city or county zoning code or ordinance is the set of detailed requirements that implement the general plan policies at the level of the individual parcel. The zoning code establishes separate districts or zones (e.g., residential, commercial, industrial, public, open space), presents standards for development in different districts, and identifies which uses are allowed in the various zoning districts to ensure neighboring land uses are compatible with one another. State law requires the city or county zoning code to be consistent with the jurisdiction's general plan. The zoning code usually establishes specific districts for agriculture and/or forestry resources to protect farmland and farming activities from incompatible nonfarm uses and vice versa. Agricultural zoning can specify many factors, such as the farm uses allowed, minimum farm size, the number of nonfarm dwellings allowed, or the size of a buffer separating farm and nonfarm properties.

Growth Control Measures

Local growth control endeavors to manage community growth by various methods, including tying development to infrastructure capacity or traffic level of service standards, limiting the number of new housing units, setting limits on the increase of commercial square footage, linking development to a jobs-to-housing balance, and adopting urban growth boundaries. These goals and others can be achieved through the adoption of a countywide growth management program. Growth management programs, such as adopting urban growth boundaries, have been implemented by county government and/or cities in all of the nine Bay Area counties. Section 3.11, "Land Use, Population, and Housing," lists cities and counties with urban growth boundaries and countywide land use measures.

Public Ownership, Purchase of Development Rights, and Open Space Acquisition

Local governments and special districts, either on their own or working with land trusts and conservancies, can acquire fee title to agricultural and open space lands or purchase development rights to preserve rural and agricultural areas, watersheds, or critical habitat or to create public parks and recreational areas. Such actions have been undertaken in all Bay Area counties and have had significant effects on the shape of cities and urban form in the region.

3.3.4 Impact Analysis

SIGNIFICANCE CRITERIA

The following significance criteria are based on CEQA Guidelines Appendix G, the criteria used in the Plan Bay Area 2040 EIR (2017), and professional judgment. Under these criteria, implementation of the proposed Plan would have a potentially significant adverse impact if it would:

- ▲ 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 nonagricultural use, or conflict with existing zoning for agricultural use, or a Williamson Act contract (Criterion AGF-1);
- ▲ 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)) (Criterion AGF-2); or
- ▲ 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 (Criterion AGF-3).

METHOD OF ANALYSIS

This program-level EIR evaluates potential impacts on agriculture and forestry resources based on the location of the proposed Plan footprint associated with the forecasted development pattern (i.e., the land use growth footprint), sea level rise adaptation infrastructure (i.e., sea level rise adaptation footprint), and transportation projects (i.e., transportation system footprint) relative to the known distribution of agriculture and forestry resources throughout the Bay Area.

Quantitative results are presented for the region (i.e., the entire footprint, often summarized by county) and for the portions of the land use growth footprint specifically within transit priority areas (TPAs). TPAs are presented as a subset of the regional and county totals. Information provided by county includes both incorporated and unincorporated areas in the county.

For this impact assessment, a geographic information system was used to digitally overlay the proposed Plan's footprints associated with the forecasted land use development pattern, sea level rise adaptation infrastructure, and transportation projects onto FMMP designations from the California Department of Conservation, lands zoned for agricultural uses, Williamson Act lands, and forest resources from USDA.

The baseline for the following analysis reflects existing conditions when the EIR NOP was released in September 2020.

This evaluation of agriculture and forestry resource impacts assumes that construction and development under the proposed Plan would adhere to applicable federal, State, and local regulations and would conform to appropriate standards in the industry, as relevant for individual projects. Where existing regulatory requirements or permitting requirements exist that are law and binding on responsible agencies and project sponsors, it is reasonable to assume that they would be implemented, thereby reducing impacts. For additional information on analysis methodology, refer to Section 3.1, "Approach to the Analysis."

IMPACTS AND MITIGATION MEASURES

Impact AGF-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, or conflict with existing zoning for agricultural use, or a Williamson Act contract (PS)

Conversion of land related to implementation of the proposed Plan's land use development pattern, sea level rise adaptation infrastructure, and transportation projects would occur during project construction. Inherently, there are no direct operational impacts following conversion of land. Therefore, construction and operation impacts are not addressed separately. Indirect impacts associated with the conversion of land are addressed in Impact AGF-3.

Land Use Impacts

Land converted from Prime or Unique Farmland or Farmland of Statewide Importance to other uses can have direct effects when productive land no longer produces crops. Indirect effects would occur if the conversion of farmland results in fragmentation of agricultural land and adjacent use conflicts, hinders existing transportation access to agricultural lands, or restricts infrastructure options that are necessary to the function of the agricultural property (see Impact AGF-3 for a discussion indirect impacts to agricultural land).

The proposed Plan's land use strategies could affect land use patterns through increases to residential density and non-residential intensity within the Plan area. The proposed Plan's focused-growth strategy directs most growth to designated growth geographies including locally nominated Priority Development Areas (PDAs), Priority Production Areas (PPAs), High Resource Areas (HRAs) and Transit Rich Areas (TRAs). Approximately 67 percent of growth in the proposed Plan would occur within these growth geographies, which reduces the effects of the Plan on agricultural lands because the land use growth footprint would generally occur on developed land. A portion of the proposed Plan's land use growth footprint (approximately 4,300 acres) overlaps with Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local importance; and approximately 5,500 acres of designated Grazing Land. A total of 1,600 acres of Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) is located within the land use growth footprint. The largest overlaps are anticipated in Contra Costa and Solano Counties (**Table 3.3-4**). In TPAs, agricultural lands included in the land use growth footprint is smaller, totaling 500 acres region-wide. While TPAs are areas in which growth is focused, they would not be developed in their entirety and would include diverse land uses in addition to jobs and housing that could include preservation of agricultural lands.

Table 3.3-4: Acreage of Land Use Growth Footprint within Agricultural Land

County		Prime Farmland (acres)	Farmland of Statewide Importance (acres)	Unique Farmland (acres)	Farmland of Local Importance (acres)	Grazing Land (acres)
Alameda	County Total	10	2	4	0	850
	Within TPAs	10	0	0	0	80
Contra Costa	County Total	320	180	20	1,900	2,100
	Within TPAs	10	0	0	60	180
Marin	County Total	0	0	0	30	40
	Within TPAs	0	0	0	2	0
Napa	County Total	7	< 1	0	420	10
	Within TPAs	0	0	0	0	0
San Francisco	County Total	0	0	0	0	0
	Within TPAs	0	0	0	0	0

County		Prime Farmland (acres)	Farmland of Statewide Importance (acres)	Unique Farmland (acres)	Farmland of Local Importance (acres)	Grazing Land (acres)
San Mateo	County Total	< 1	0	20	0	4
	Within TPAs	0	0	0	0	0
Santa Clara	County Total	70	8	80	60	310
	Within TPAs	< 1	0	50	6	30
Solano	County Total	570	50	250	0	2,000
	Within TPAs	0	0	0	0	70
Sonoma	County Total	10	< 1	< 1	310	130
	Within TPAs	< 1	0	0	< 1	0
Regional Total	County Total	980	230	370	2,700	5,500
	Within TPAs	20	0	50	70	360

Note: TPA acreages are a subset of county acreages. Numbers less than 1 are shown as "<1"; whole numbers have been rounded (between 0 and 10 to the nearest whole number, between 11 and 999 to the nearest 10, between 1,000 and 1,000,000 to the nearest 100). Figures may not sum because of independent rounding.

Sources: MTC and ABAG 2021; DOC 2018

Additionally, the land use growth footprint overlaps with approximately 2,700 acres and 210 acres of lands that are zoned for agricultural uses or under Williamson Act contract, respectively (**Table 3.3-5**).

Table 3.3-5: Acreage of Land Use Growth Footprint within Agricultural Zoning or Williamson Act Contracts

County		Agricultural Zoning (acres)	Williamson Act Contract (acres)
Alameda	County Total	140	130
	Within TPAs	7	< 1
Contra Costa	County Total	160	< 1
	Within TPAs	< 1	0
Marin	County Total	3	0
	Within TPAs	< 1	0
Napa	County Total	< 1	0
	Within TPAs	0	0
San Francisco	County Total	0	0
	Within TPAs	0	0
San Mateo	County Total	20	0
	Within TPAs	5	0
Santa Clara	County Total	320	< 1
	Within TPAs	130	0
Solano	County Total	2,000	80
	Within TPAs	60	0
Sonoma	County Total	110	1
	Within TPAs	< 1	0
Regional Total	County Total	2,700	210
	Within TPAs	200	< 1

Note: TPA acreages are a subset of county acreages. Numbers less than 1 are shown as "<1"; whole numbers have been rounded (between 0 and 10 to the nearest whole number, between 11 and 999 to the nearest 10, between 1,000 and 1,000,000 to the nearest 100). Figures may not sum because of independent rounding.

Sources: Data compiled by MTC and ABAG 2021

The proposed Plan includes strategies to help protect natural lands and farmlands and reduce overall land consumption. Strategy EN04, Maintain Urban Growth Boundaries, confines new development within areas of existing development or areas otherwise suitable for growth, as established by local jurisdictions. Strategy EN05, Protect and Manage High-Value Conservation Lands, provides strategic matching funds to help conserve and maintain high-priority natural and agricultural lands, including but not limited to PCAs and wildland-urban interface lands. Other strategies, in combination with the growth geographies, promote a more compact development pattern, which helps to preserve agricultural lands. Except for San Francisco, all counties in the Bay Area protect open space and agricultural lands by countywide land use measures, such as urban growth boundaries, urban service areas, environmental corridors, slope/density restrictions, stream conservation areas, or riparian buffers. Counties and cities with urban growth boundaries are summarized in **Table 3.3-6**. Generally, this means that if a project falls outside an urban growth boundary, there are regulatory measures in place to aid local jurisdictions in farmland protection. However, there are many cities without urban growth boundaries, and other general growth measures that are in place vary in effectiveness and enforcement.

Table 3.3-6: Bay Area Urban Growth Boundaries and Countywide Land Use Measures

County	Countywide Measure	Cities with an Urban Growth Boundary
Alameda	Yes	Dublin, Fremont, Hayward, Livermore, Pleasanton
Contra Costa	Yes	Antioch, Contra Costa, Danville, El Cerrito, Hercules, Martinez, Oakley, Orinda, Pinole, Pittsburg, Pleasant Hill, Richmond, San Pablo, San Ramon, Walnut Creek
Marin	Yes	Novato
Napa	Yes	American Canyon, Napa, St. Helena, Yountville
San Francisco	No	--
San Mateo	Yes	Urban-Rural Boundary applies to all jurisdictions
Santa Clara	Yes	Cupertino, Gilroy, Los Gatos, Milpitas, Morgan Hill, Palo Alto, San José
Solano	Yes	Benicia, Fairfield, Rio Vista, Vallejo, Vacaville
Sonoma	Yes	Cloverdale, Cotati, Healdsburg, Petaluma, Rohnert Park, Santa Rosa, Sebastopol, Sonoma, Windsor

Note: San Francisco has no affected farmland acres.

Source: Greenbelt Alliance 2020

The proposed Plan's land use growth footprint could have the potential to convert Prime or Unique Farmland or Farmland of Statewide Importance and conflict with land managed pursuant to Williamson Act contracts. The proposed Plan could affect land use patterns through increases to residential density and non-residential intensity within the Plan area. While the land use strategies in the Plan are intended to encourage growth in urbanized areas, some growth could occur in areas that could potentially convert Prime or Farmland of Statewide Importance or Unique Farmland and conflict with existing zoning for agricultural use or Williamson Act contracts. The potential conversion of Farmland, lands zoned for agriculture, and lands under Williamson Act contracts would be potentially significant (PS).

Sea Level Rise Adaptation Impacts

The proposed Plan's sea level rise adaptation footprint has the potential to convert 270 acres of Farmland of Local Importance and 50 acres of Grazing Land. No Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) is located within the sea level rise adaptation footprint. Of the potentially affected agricultural land, all is Farmland of Local Importance and Grazing Land and is located in Alameda, Marin, Solano, and Sonoma Counties (Table 3.3-7).

Table 3.3-7: Acreage of Sea Level Rise Adaptation Footprint within Agricultural Land

County	Prime Farmland (acres)	Farmland of Statewide Importance (acres)	Unique Farmland (acres)	Farmland of Local Importance (acres)	Grazing Land (acres)
Alameda	0	0	0	0	7
Contra Costa	0	0	0	0	0
Marin	0	0	0	170	20
Napa	0	0	0	0	0
San Francisco	0	0	0	0	0
San Mateo	0	0	0	0	0
Santa Clara	0	0	0	0	0
Solano	0	0	0	0	<1
Sonoma	0	0	0	110	30
Regional Total	0	0	0	270	50

Notes: Numbers less than 1 are shown as "<1"; whole numbers have been rounded (between 0 and 10 to the nearest whole number, between 11 and 999 to the nearest 10). Figures may not sum because of independent rounding.

Sources: MTC and ABAG 2021; DOC 2018

Additionally, implementation of the sea level rise adaptation infrastructure has the potential to convert 590 acres of zoned agricultural land and 160 acres of farmland under Williamson Act contract, as documented in **Table 3.3-8**.

Table 3.3-8: Acreage of Sea Level Rise Adaptation Footprint within Agricultural Zoning or Williamson Act Contracts

County	Agricultural Zoning (acres)	Williamson Act Contract (acres)
Alameda	0	30
Contra Costa	40	0
Marin	20	3
Napa	0	0
San Francisco	0	0
San Mateo	0	0
Santa Clara	300	30
Solano	160	90
Sonoma	80	10
Regional Total	590	160

Note: Numbers less than 1 are shown as "<1"; whole numbers have been rounded (between 0 and 10 to the nearest whole number, between 11 and 999 to the nearest 10, between 1,000 and 1,000,000 to the nearest 100). Figures may not sum because of independent rounding.

Sources: Data compiled by MTC and ABAG 2021

The extent of farmland conversion would depend on the final scale and design of proposed adaptation infrastructure. Some conversion could be substantial in Santa Clara and Solano Counties, depending on the amount and type of farmland that is converted. The potential conversion of Farmland, lands zoned for agriculture, and lands under Williamson Act contract due to implementation of sea level rise adaptation infrastructure under the proposed Plan would be potentially significant (PS).

Transportation System Impacts

The proposed Plan's transportation projects footprint overlays 730 acres of farmland and 1,500 acres of Grazing Land, which represents less than 1 percent of all agricultural land in the Plan area. A total of 270 acres of Farmland (Prime Farmland, Unique Farmland, and Farmland of Statewide Importance) is located within the transportation projects footprint. Of the potentially affected agricultural land, the

majority (67 percent) is Grazing Land, 21 percent is Farmland of Local Importance, 9 percent is Prime Farmland, and Farmland of Statewide Importance and Unique Farmland account for less than 1 percent (**Table 3.3-9**). The proposed Plan's transportation projects footprint has the potential to convert 1,900 acres of zoned agricultural land and 240 acres of farmland under Williamson Act contract, as documented for each county in **Table 3.3-10**.

Table 3.3-9: Acreage of Transportation Projects Footprint within Agricultural Land

County	Prime Farmland (acres)	Farmland of Statewide Importance (acres)	Unique Farmland (acres)	Farmland of Local Importance (acres)	Grazing Land (acres)
Alameda	6	<1	2	<1	590
Contra Costa	30	1	30	270	120
Marin	0	0	0	60	10
Napa	5	7	0	50	40
San Francisco	0	0	0	0	0
San Mateo	0	0	0	0	0
Santa Clara	150	20	7	20	500
Solano	30	2	<1	0	200
Sonoma	0	0	0	60	2
Regional Total	210	30	30	460	1,500

Note: Numbers less than 1 are shown as "<1"; whole numbers have been rounded (between 0 and 10 to the nearest whole number, between 11 and 999 to the nearest 10, between 1,000 and 1,000,000 to the nearest 100). Figures may not sum because of independent rounding.

Sources: MTC and ABAG 2021; DOC 2018

Table 3.3-10: Acreage of Transportation Projects Footprint within Agricultural Zoning or Williamson Act Contracts

County	Agricultural Zoning (acres)	Williamson Act Contract (acres)
Alameda	340	30
Contra Costa	350	10
Marin	20	3
Napa	60	0
San Francisco	0	0
San Mateo	<1	0
Santa Clara	920	170
Solano	220	20
Sonoma	20	7
Regional Total	1,900	240

Note: Numbers less than 1 are shown as "<1"; whole numbers have been rounded (between 0 and 10 to the nearest whole number, between 11 and 999 to the nearest 10, between 1,000 and 1,000,000 to the nearest 100). Figures may not sum because of independent rounding.

Sources: Data compiled by MTC and ABAG in 2021

The likelihood of farmland conversion increases where transportation projects are located at the edges of existing urban areas, along waterways, or over hills separating urban areas. The extent of this area would depend on the final scale and design of transportation projects. Some conversion could be substantial, depending on the amount and type of farmland that is converted. The potential conversion of Farmland of Local Importance, lands zoned for agriculture, and lands under Williamson Act contract due to implementation of transportation projects under the proposed Plan would be potentially significant (PS).

Conclusion

Together, the proposed Plan's land use growth footprint, sea level rise adaptation footprint, and transportation projects footprint have the potential to convert Farmland, lands zoned for agriculture, and lands under Williamson Act contract to urban uses. The overall amount of these conversions relative to the resources would be small, as described above. However, because some conversion could be substantial within a county or local municipality, the conversion of Farmland, lands zoned for agriculture, and lands under Williamson Act contracts as a result of land use, sea level rise adaptation infrastructure, or transportation projects would be **potentially significant (PS)**. Mitigation Measure AGF-1 addresses this impact and is described below.

Mitigation Measures

Mitigation Measure AGF-1 Implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations, that include those identified below:

- ▲ Require project relocation or corridor realignment, where feasible, to avoid agricultural land, especially Prime Farmland, Farmland of Statewide Significance, and land under a Williamson Act contract.
- ▲ Provide buffers, berms, setbacks, fencing, or other project design measures to protect surrounding agriculture, and to reduce conflict with farming that could result from implementation of transportation improvements and/or projected land use pattern included as a part of the RTP/SCS.
- ▲ Maintain and expand agricultural land protections such as urban growth boundaries [].
- ▲ Achieve compensatory mitigation in advance of impacts through the purchase or creation of mitigation credits or the implementation of mitigation projects through Regional Advance Mitigation Planning, as deemed appropriate by the permitting agencies.
- ▲ Require acquisition of conservation easements on land in the same jurisdiction, if feasible, and at least equal in quality and size as mitigation for the loss of agricultural land.
- ▲ Institute new protection of farmland in the project area or elsewhere through the use of long-term restrictions on use, such as 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.) or 10-year Williamson Act contracts (Government Code Section 51200 et seq.).

Significance after Mitigation

Implementation of Mitigation Measure AGF-1 would reduce the potentially significant impact of conversion of Farmland, lands zoned for agriculture, and lands under Williamson Act contracts to other uses because it would require avoidance or compensation for converted lands. Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as feasible, to address site-specific conditions. However, the mitigation would not ensure that the future land use development pattern, sea level rise adaptation infrastructure, and transportation projects could feasibly relocate or realign to avoid conversion of Farmland, lands zoned for agriculture, and lands under Williamson Act contract to a less-than-significant level. Accordingly, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Impact AGF-2: 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)) (PS)

Conversion of land related to implementation of the proposed Plan's land use development pattern, sea level rise adaptation infrastructure, and transportation projects would occur during project construction. Inherently, there are no direct operational impacts following conversion or rezoning of land. Therefore, construction and operation impacts are not addressed separately. Indirect impacts are addressed in Impact AGF-3.

Land Use Impacts

Land converted from timberland to other use would have direct effects related to the loss of timber crops production. Indirect effects would occur to the extent that conversion creates fragmentation of timberland and adjacent use conflicts or hinders existing transportation access to timberlands (see AGF-3 for a discussion of indirect impacts).

As shown in **Table 3.3-11**, a total of 280 acres of forest land overlap with the proposed Plan's land use growth footprint. The majority of forest land that overlaps with the growth footprint is located in Contra Costa County. Approximately 20 acres of forest land is located within TPAs. In addition, current timberland or forest land zoning exists in Contra Costa, Sonoma, and San Mateo Counties. The majority of projected development in the proposed Plan would occur on existing urban land, thereby minimizing impacts on forest land or timberland. As noted above, some Bay Area cities have urban growth boundaries, which help to protect natural lands such as forest land and timberland. While the potential conversion of 280 acres of forestland and timberland would be potentially significant (PS), it represents a small fraction of all Plan area forest land and timberland.

Table 3.3-11: Acreage of Land Use Growth Footprint within Forestland and Timberland

County		Total (acres)
Alameda	County Total	10
	Within TPAs	<1
Contra Costa	County Total	170
	Within TPAs	1
Marin	County Total	30
	Within TPAs	20
Napa	County Total	<1
	Within TPAs	0
San Francisco	County Total	2
	Within TPAs	2
San Mateo	County Total	30
	Within TPAs	<1
Santa Clara	County Total	2
	Within TPAs	0
Solano	County Total	7
	Within TPAs	0

County		Total (acres)
Sonoma	County Total	30
	Within TPAs	0
Regional Total	County Total	280
	Within TPAs	20

Notes: TPA acreages are a subset of county acreages. Numbers less than 1 are shown as “<1”; whole numbers have been rounded (between 0 and 10 to the nearest whole number, between 11 and 999 to the nearest 10). Figures may not sum because of independent rounding.

Sources: Data compiled by MTC and ABAG in 2021 based on data from USDA 2019

Sea Level Rise Adaptation Impacts

The proposed Plan’s sea level rise adaptation footprint has the potential to convert approximately 2 acres of forest land or timberland. Of the potentially affected forest land or timberland, approximately 2 acres are in Marin County and less than 1 acre is in Alameda County, as documented for each county in **Table 3.3-12**.

Table 3.3-12: Acreage of Sea Level Rise Adaptation Footprint within Forestland and Timberland

County	Total (acres)
Alameda	<1
Contra Costa	0
Marin	2
Napa	0
San Francisco	0
San Mateo	0
Santa Clara	0
Solano	0
Sonoma	0
Regional Total	2

Notes: Numbers less than 1 are shown as “<1”; whole numbers have been rounded to the nearest whole number.

Sources: Data compiled by MTC and ABAG in 2021 based on data from USDA 2019

Forest land and timberland conversion is anticipated to be approximately 2 acres, though the extent of this area would depend on the final scale and design of sea level rise adaptation infrastructure. The conversion of forest land and timberland from sea level rise adaptation infrastructure would be less than significant (LTS).

Transportation System Impacts

Overall, there are transportation projects in eight counties with the potential to affect approximately 100 acres of forest land or timberland. This is less than 1 percent of overall forest land and timberland acres in the Plan area. The vast majority of this forest land is located in Santa Clara (100 acres). All other counties have 3 acres or less of forest land and timberland within the transportation projects footprint, as identified in **Table 3.3-13**. As discussed in Section 3.1, “Approach to the Analysis,” the area of potential affect is likely to be a conservative (i.e., overstated) estimate of disturbance.

The likelihood of forest land and timberland conversion increases where transportation projects are located at the edges of existing urban areas, along waterways, or in areas currently separating urban areas. The extent of this impact would depend on the final scale and design of proposed projects. Nonetheless, the conversion of forest land and timberland acreage would be potentially significant (PS).

Table 3.3-13: Acreage of Transportation Projects Footprint within Forestland and Timberland

County	Total (acres)
Alameda	<1
Contra Costa	3
Marin	<1
Napa	0
San Francisco	<1
San Mateo	<1
Santa Clara	100
Solano	2
Sonoma	<1
Regional Total	100

Notes: Numbers less than 1 are shown as "<1"; whole numbers have been rounded (between 0 and 10 to the nearest whole number, between 11 and 999 to the nearest 10). Figures may not sum because of independent rounding.

Sources: Data compiled by MTC and ABAG in 2021 based on data from USDA 2019

Conclusion

Together, the proposed Plan's land use growth footprint, sea level rise adaptation footprint, and transportation projects footprint have the potential to convert forest lands and timberlands to urban uses. The overall amount of these conversions relative to the resources would be small, as described above. The conversion of forest land and timberland from sea level rise adaptation infrastructure would be less than significant, as discussed above. However, because some conversion could be substantial within a county or local municipality, the conversion of forest land or timberlands as a result of land use development pattern and transportation projects would be **potentially significant (PS)**. Mitigation Measure AGF-2 addresses this impact and is described below.

Mitigation Measures

Mitigation Measure AGF-2 Implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations, that include those identified below:

- ▲ Require project relocation or corridor realignment, where feasible, to avoid forest land or timberland.
- ▲ Maintain and expand forest land protections such as urban growth boundaries.
- ▲ Achieve compensatory mitigation in advance of impacts through the purchase or creation of mitigation credits or the implementation of mitigation projects through Regional Advance Mitigation Planning, as deemed appropriate by the permitting agencies.
- ▲ Require acquisition of conservation easements on land at least equal in quality and size as mitigation for the loss of forest land or timberland.

Significance after Mitigation

Implementation of Mitigation Measure AGF-2 would reduce the potentially significant impact of conversion of forest or timberland to other uses because it would require avoidance or compensation for converted lands. Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as feasible, to address site-specific conditions. However, because the mitigation would not ensure that the future land use development pattern, sea level rise adaptation infrastructure, and transportation projects could feasibly relocate or realign to avoid forestland or timberland and because compensation may

not adequately reduce the impact to a less-than-significant level, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Impact AGF-3: 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 (PS)

Land Use, Sea Level Rise Adaptation, and Transportation System Impacts

Anticipated growth under the proposed Plan would result in conversion of Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) to non-agricultural use and conversion of forest land to non-forest use. Although the proposed Plan would include land use strategies and transportation projects that focus new anticipated development in the region's urban built-up areas, some new development is anticipated to occur in agricultural areas, on forest land, and/or near the wildland-urban interface. As described under Impact AGF-1, implementation of the proposed Plan would result in the conversion of Farmland, lands zoned for agriculture, and lands under Williamson Act contract. Lands that remain agricultural but located adjacent to urban uses, may feel pressure to develop, as nearby land values increase or as nuisances from urban development spread to agricultural lands. In addition, urban uses, especially newly urbanized areas, can lead to pressure on adjacent farms to change their farming practices (e.g., changing schedules to reduce noise or altering the extent or method of fertilizer and pesticide spraying). Further, expanded transportation infrastructure capacity and the implementation of SLR infrastructure could remove obstacles to growth in existing agricultural areas.

A range of local conservation plans, habitat conservation agencies and State/federal park designated areas provide protection for a substantial amount of forest land and farmland. The majority of projected development under the proposed Plan would occur on existing urban land, thereby minimizing impacts and potential further fragmentation of farmland, forest land or timberland. As noted above, some Bay Area cities have urban growth boundaries to limit sprawl and protect forest land and agricultural land and timberland. However, a substantial amount of land on the urban and suburban fringe is vulnerable to development, if not within the boundaries of protected lands, and face additional development pressure as adjacent lands are converted from undeveloped to developed uses. Therefore, development projects anticipated to occur under the proposed Plan could have the potential to cause other changes in the existing environment that could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. This impact would be potentially significant (PS).

Conclusion

The proposed Plan is intended to accommodate future growth within existing municipal boundaries and urbanized areas. However, implementation of the Plan's land use development pattern, sea level rise adaptation infrastructure, and transportation projects could result in conversion of Farmland or forest land to other uses that would potentially place development pressure onto adjacent undeveloped lands. This impact would be **potentially significant (PS)**. Mitigation Measure AGF-3 addresses this impact and is described below.

Mitigation Measures

Mitigation Measure AGF-3 Implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations, that include those identified below:

- ▲ Implement Mitigation Measures AGF-1 and AGF-2.
- ▲ Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.
- ▲ Design project features to minimize fragmenting or isolating agricultural land. Where a project involves acquiring land or easements, ensure that the remaining agricultural land is of a size sufficient to allow economically viable farming operations. The project sponsors shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.

Significance after Mitigation

Implementation of Mitigation Measure AGF-3 would reduce the potentially significant impact of conversion Farmland or forestland to other uses because it would require avoidance or compensation for converted lands. Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as feasible, to address site-specific conditions. However, for the reasons described above, the mitigation measures may not be feasible or may not adequately reduce the impact to a less-than-significant level. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.