3.1 Agricultural Resources

This section addresses how the proposed scenarios would or would not result in adverse physical environmental impacts on surrounding agricultural resources. Changes in land use patterns that result from new roadways or changes in circulation can affect the character of an area, as well as impose physical impacts to the environment.

3.1.1 Regulatory Setting

3.1.1.1 Federal

a. Farmland Protection Policy Act

Congress enacted the Farmland Protection Policy Act to ". . . minimize the extent to which federal programs contribute to the unnecessary and irreversible conversion of farmland to nonagricultural uses. . ." (7 United States Code [USC] 4201(b), et seq.). Pursuant to the Farmland Protection Policy Act, the Secretary of Agriculture is directed to establish and carry out the program. The Natural Resource Conservation Service developed a rating system (Land Evaluation and Site Assessment [LESA]) of agricultural suitability of land compared to demands created by non-agricultural uses of the land. The Act spells out requirements to ensure that federal programs, to the extent practical, are compatible with state, local, and private programs and policies to protect farmland, and calls for the use of LESA to aid in the analysis. The Farmland Protection Policy Act requires federal agencies to examine the impacts of their programs before they approve any activity that would convert farmland. However, the Act has no requirement for federal agencies to alter projects to avoid or minimize farmland conversion.

3.1.1.2 State

a. California Department of Conservation – Farmland Mapping and Monitoring Program

Utilizing data from the U.S. Department of Agriculture, Natural Resource Conservation Service, soil surveys, and current land use information, the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) compiles important farmland maps. In 1982, the Department of Conservation enacted the FMMP in response to a critical need for assessing the location, quality, and quantity of agricultural lands and conversion of these lands over time. The FMMP is a non-regulatory program and provides a consistent and impartial analysis of agricultural land use and land use changes throughout California. Maps and statistics are produced biannually using a process that integrates aerial photo interpretation, field mapping, a computerized mapping system, and public review. These maps categorize land use into eight mapping

categories and represent an inventory of agricultural soil resources. For the City, the maps are replicated as Figure OS-2 -- Agricultural Suitability in the General Plan 2025, as amended by the Third Addendum to General Plan 2025 FEIR. It is important to note that California Environmental Quality Act's (CEQA's) definition of "agricultural land" only includes Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. Through the FMMP, agricultural resources are separated into the following categories:

- **Prime Farmland:** Lands with the best combination of physical and chemical features and able to sustain long-term production of agricultural crops. This land must have been used to produce irrigated crops at some time during the two update cycles prior to the mapping date.

- **Farmland of Statewide Importance:** Lands similar to Prime Farmland, but with minor shortcomings, such as greater slopes or less ability to store soil moisture. This land must have been used to produce irrigated crops at some time during the two update cycles prior to the mapping date.

- **Unique Farmland:** Lands with lesser quality soils used to produce leading agricultural crops. Includes non-irrigated orchards or vineyards.

- **Farmland of Local Importance:** These lands are non-irrigated properties that are either currently producing crops or had the capacity of production. This category includes dryland grain, dairies, and other agriculturally zoned land not included in the above categories and which may be important to the local economy due to its productivity.

- **Grazing Land:** Lands on which existing vegetation is suited to livestock grazing. This category was developed in cooperation with the California Cattlemen's Association and University of California Cooperative Extension.

b. Williamson Act Land Preserves

In 1965, the California Land Conservation Act, also known as the Williamson Act, was adopted. This voluntary program allows property owners to have their property assessed on the basis of its agricultural production rather than at the current market value. The property owner is thus relieved of having to pay higher property taxes, as long as the land remains in agricultural production. The purpose of the Act is to encourage property owners to continue to farm their land, and to prevent the premature conversion of farmland to urban uses. Participation requires that the area consist of 100 contiguous acres of agricultural land under one or more ownerships.

Upon approval of an application by the City Council, the agricultural preserve is established, and the land within the preserve is restricted to agricultural and compatible uses for 10 years. Williamson Act contracts are automatically renewed annually for an

additional one-year period, unless the property owner applies for non-renewal or early cancellation. The Williamson Act also contains limited provisions for cancellation of contracts. In this case, specific findings regarding the non-viability of the agricultural use must be made, and a substantial penalty for the cancellation is assessed.

3.1.1.3 City of Riverside

a. Agricultural Preservation – Proposition R and Measure C

In 1979, Riverside voters approved Proposition R: "Taxpayer's Initiative to Reduce Costly Urban Sprawl by Preserving Riverside's Citrus and Agricultural lands, Its Unique Hills, Arroyos and Victoria Avenue." The two main features of Proposition R relate to: (1) preservation of agriculture through application of the RA-5-Residential Agricultural Zone to two specific areas of the City of Riverside (City), and (2) protection of hillside areas through application of the RC-Residential Conservation Zone to areas of the City based on slopes over 15 percent. The two areas of the City which were zoned to RA-5 are the Arlington Heights Greenbelt in the south and central portion of the City (Figure 3.1-1), and an area commonly known as Rancho La Sierra lying on a bluff above the Santa Ana River and bordered by Tyler Street on the east and Arlington Avenue on the west.

In 1987, Riverside voters passed Measure C, an amendment to Proposition R, entitled "Citizens' Rights Initiative to Reduce Costly Urban Sprawl, to Reduce Traffic Congestion, to Minimize Utility Rate Increases and to Facilitate Preservation of Riverside's Citrus and Agricultural Lands, its Scenic Hills, Ridgelines, Arroyos and Wildlife Areas." Measure C amended Proposition R to promote agriculture by adding the following as official City policy:

> It is hereby declared to be the policy of the City of Riverside to promote and encourage agriculture as an essential industry and a desirable open space use. The Greenbelt and La Sierra Lands are important agricultural lands because of their high soil quality, favorable climate and low water costs. It is further declared to be the policy of the City to retain, wherever feasible, agricultural lands in private ownership and to encourage and assist the maintenance and formation of family farms, especially for farmers who live on their land.

Measure C relates to the Arlington Heights Greenbelt, the Arlanza–La Sierra Lands and any area designated for agricultural use in the General Plan 2025. In summary, Measure C promotes the preservation of agricultural uses in these areas by:

- Ensuring that the Gage Canal water is reserved for agricultural uses as the highest priority;

- Protecting the Arlington Heights Greenbelt from heavy traffic;
- Minimizing the extension of City services and urban infrastructure into agricultural land areas affected by Measure C, except as needed for agricultural purposes;
- Developing and implementing public service and infrastructure standards compatible with and appropriate for agricultural lands; and
- Planning and implementing wherever feasible in the Arlington Heights Greenbelt, in the La Sierra Lands, in the Sycamore Canyon Park area, and in other appropriate areas for recreational opportunities for biking, equestrian and hiking uses consistent with farming needs, agricultural uses, and wildlife protection.

Both Proposition R and Measure C can only be repealed through referendum (popular vote) by the residents of Riverside.

b. City of Riverside General Plan 2025

The General Plan 2025 contains objectives, policies and tools that aim to retain, protect and encourage agricultural land use. Relevant General Plan 2025 objectives and policies that encourage the implementation of Proposition R and Measure C, development of agricultural zones, and development of suitable buffers around agricultural uses to prevent incompatible land uses adjacent to agricultural uses are as follows:

Land Use and Urban Design Element

Policy LU-6.1: Enforce and adhere to the protections for agricultural areas set forth in Proposition R and Measure C.

Policy LU-6.2: Preserve the viability of the Gage Canal to enable continued agricultural and citricultural uses within the City.

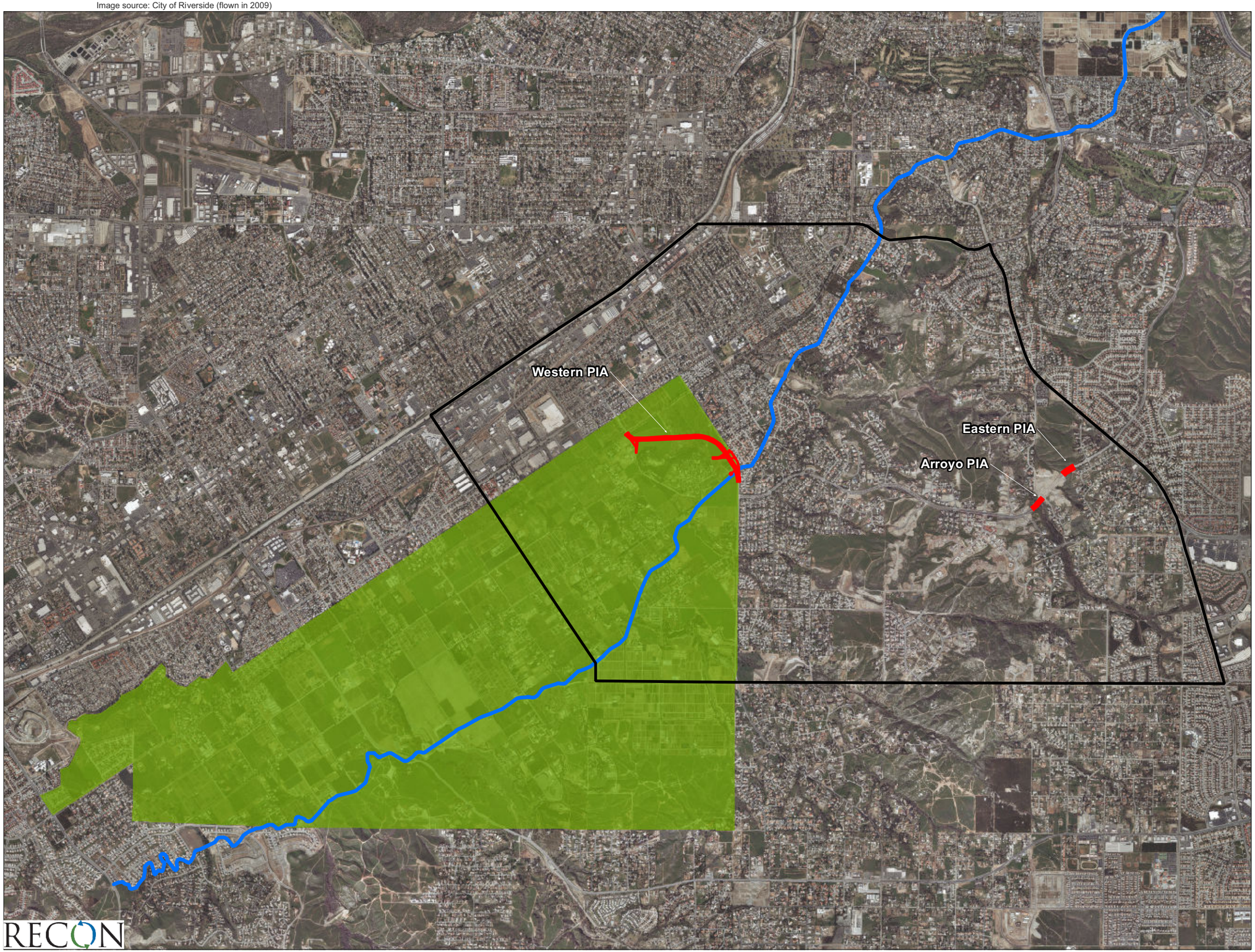
Open Space and Conservation Element

Policy OS-3.1: Promote and encourage agriculture as an essential industry and a desirable open space use. The Arlington Heights Greenbelt and La Sierra Lands (i.e., Rancho La Sierra) are important agricultural lands because of their high soil quality, favorable climate and low water costs.

Policy OS-3.2: Identify land for retention and encouragement of agricultural use based on consideration of historic use, soil suitability, agricultural significance, prevailing parcel sizes and geographical associations.

Policy OS-4.1: Continue to implement Proposition R and Measure C.

Image source: City of Riverside (flown in 2009)



Project Vicinity
Project Impact Areas (PIA)
Arlington Heights Greenbelt
Gage Canal

0 Feet 2,000

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FIGURE 3.1-1

Arlington Heights Greenbelt and Gage Canal

3.1.2 Environmental Setting

3.1.2.1 Important Farmland

The City's economy during the nineteenth and most of the twentieth century was based on agriculture, primarily the citrus industry. Large areas of the City remained in citrus groves into the 1950s. During this period, agriculture was the largest industry in Riverside County, providing employment for a significant portion of the City's population. During the latter part of the twentieth century, pressure increased to convert agricultural land to suburban uses. Pressure from urbanization, foreign competition, and rising production and water costs increased the loss of agricultural lands, resulting in numerous citriculture areas converted to urban and suburban uses. The remaining agricultural lands represent a significant open space and economic resource for Riverside County.

As detailed in Policy OS-3.1 above, the Arlington Heights Greenbelt and La Sierra Lands (i.e., Rancho La Sierra) are important agricultural lands because of their high soil quality, favorable climate, and low water costs. The La Sierra Lands are outside of the Project vicinity.

The Arlington Heights Greenbelt, located in the southwestern portion of the Project vicinity, includes public areas such as the California Citrus State Historic Park and Victoria Avenue. Other portions of the Greenbelt consist primarily of private lands protected by Proposition R and Measure C, in use as citrus groves, plant nurseries, and very low-density residential development.

A portion of the Arlington Heights Greenbelt is within the Project vicinity, while the other portion is outside of the Project vicinity boundary. For the purpose of analysis within this section, all of the Arlington Heights Greenbelt is examined in relation to the Project. The Arlington Heights Greenbelt contains Prime Farmland, Unique Farmland, Farmland of Statewide Importance, and Farmland of Local Importance (Table 3.1-1, Figure 3.1-2).

TABLE 3.1-1
IMPORTANT FARMLAND WITHIN THE ARLINGTON HEIGHTS GREENBELT

FMMP Category	Total acres within Greenbelt
Prime Farmland	791.76
Farmland of Statewide Importance	883.27
Unique Farmland	1,187.56
Farmland of Local Importance	487.41
	3,350.00

3.1.2.2 Williamson Act Preserve Land

There are four parcels currently under the Williamson Act within the Project vicinity (refer to Figure 3.1-3) but not within any existing or proposed rights-of-way for the alignments. These parcels are 237-180-001, 237-180-002, 237-180-003, and 237-180-007.

3.1.3 Significance Determination Thresholds

For this analysis, an impact pertaining to agricultural resources was considered significant under CEQA Guidelines, impacts to agricultural resources would be significant if the proposed Project would:

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;

2. Conflict with existing zoning for agricultural use, or a Williamson Act contract;

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.

As discussed in the Initial Study Checklist (Appendix B), the proposed Project would have no impact or a less than significant impact in regard to the following criteria:

- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)); or

- Result in the loss of forest land or conversion of forest land to non-forest use.

3.1.4 Issues 1 and 3: Farmland Conversion

Would the proposed Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the FMMP of the California Resources Agency, to non-agricultural use; 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?

Image source: City of Riverside (flown in 2009)

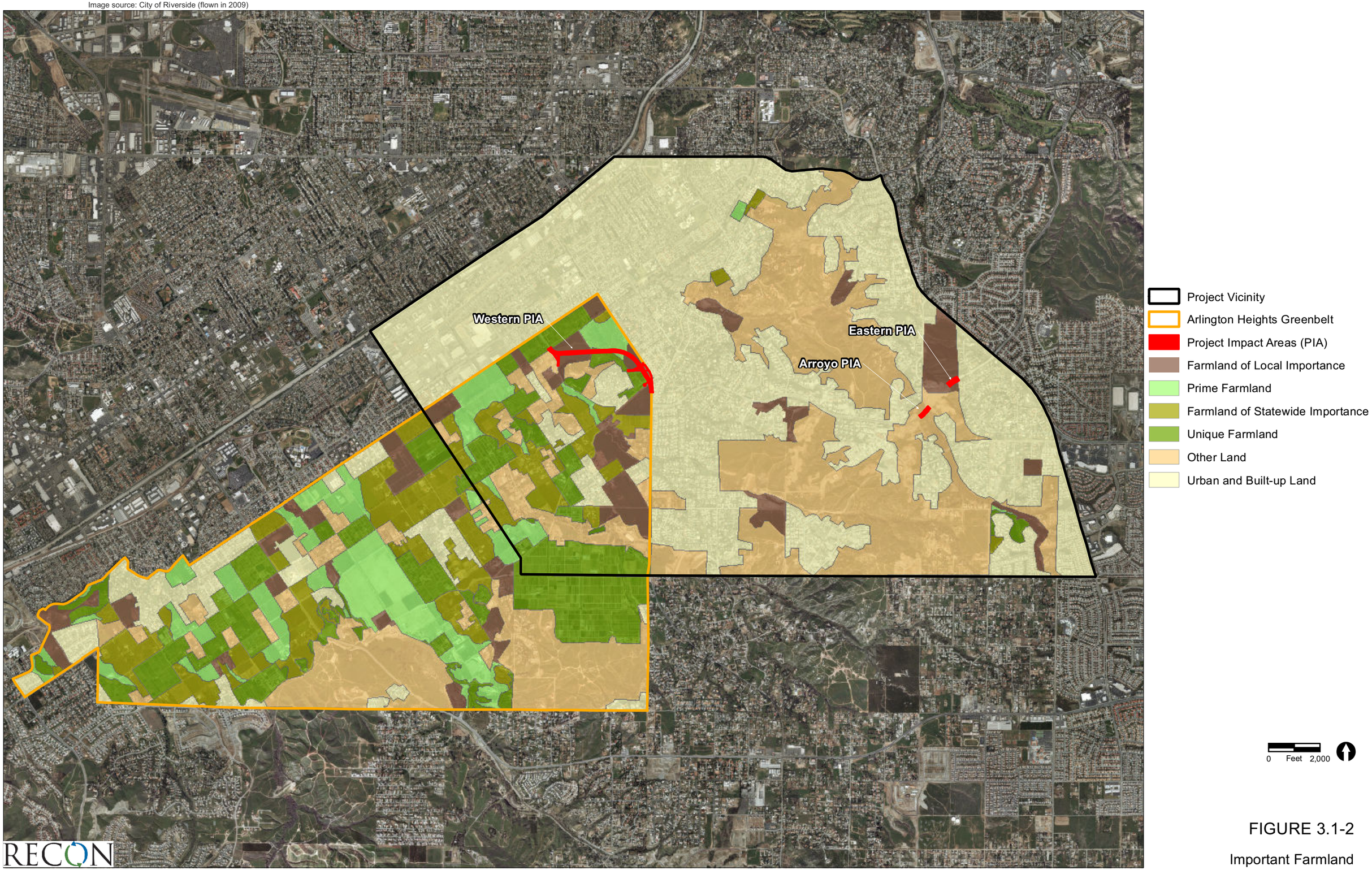

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FIGURE 3.1-2

Important Farmland

Image source: City of Riverside (flown in 2009)

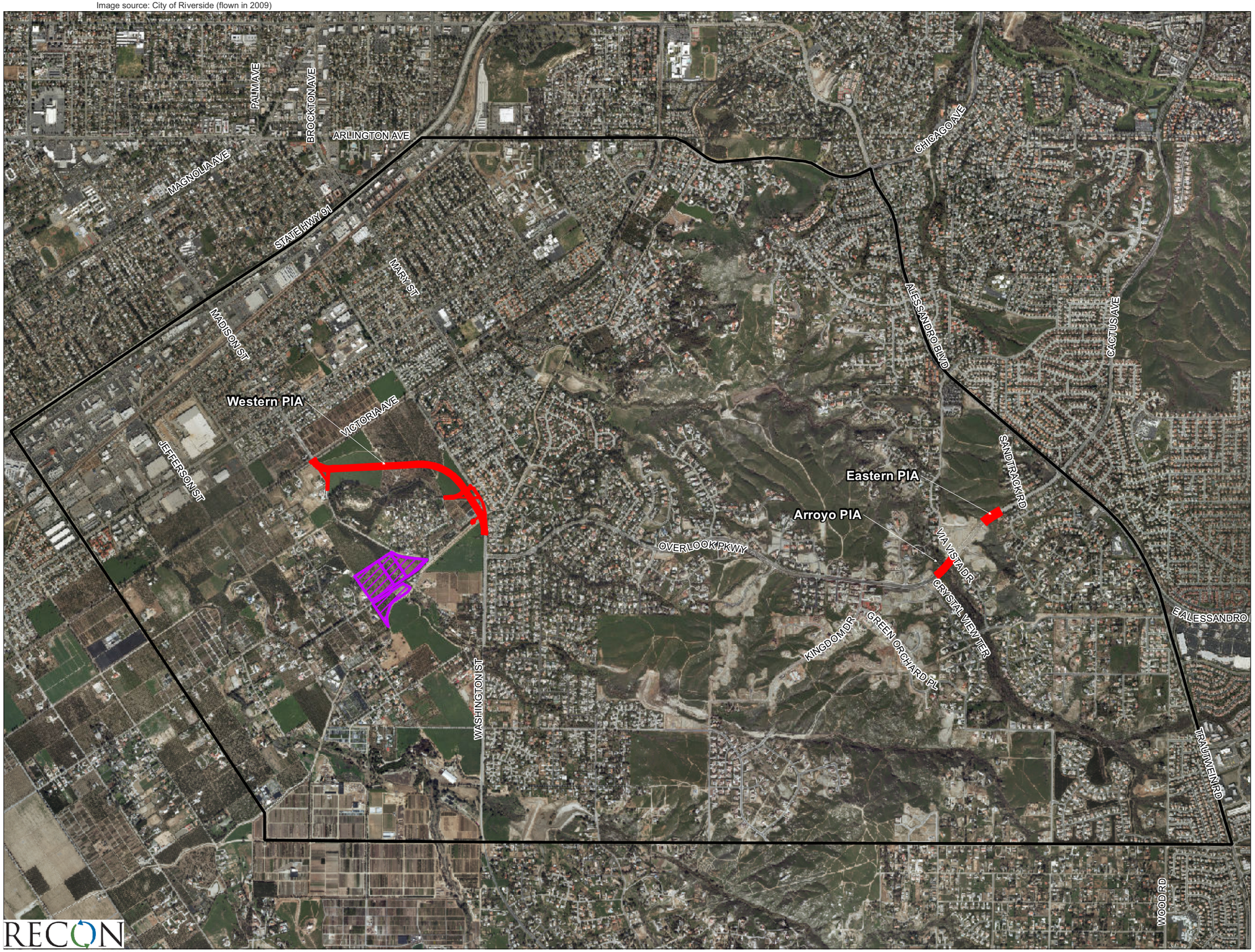

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FIGURE 3.1-3

Williamson Act Contract Lands

3.1.4.1 Impact Analysis

The loss of designated farmland, especially the loss or weakening of the economic viability of farmland due to development, is a concern of the California Department of Conservation, as well as the City and its residents as indicated by the voter initiated and adopted Proposition R and Measure C. Impacts to the various farmland categories under each scenario are detailed below.

Scenario 1

This scenario would not convert any Prime, Unique, or Farmland of Statewide Importance. The gates at both Crystal View Terrace and Green Orchard Place would remain closed, no improvements would occur, and Overlook Parkway would remain in its present condition. Because these Project features would not result in the conversion or loss of designated farmland, **no impact** would occur.

Scenario 2

This scenario would not convert any Prime, Unique, or Farmland of Statewide Importance. The gates at both Crystal View Terrace and Green Orchard Place would be permanently removed, allowing traffic to pass through the existing residential communities. Overlook Parkway would not be connected but would remain on the Master Plan of Roadways in the General Plan 2025. However, the General Plan 2025 would be amended to remove policies pertaining to the gates. Because these Project features would not result in the conversion or loss of designated farmland, **no impact** would occur**.**

Scenario 3

Under Scenario 3, Overlook Parkway would be constructed over the Alessandro Arroyo and continue easterly to Alessandro Boulevard. The fill crossing west of Sandtrack Road and a bridge over the Alessandro Arroyo, a natural open space feature, would be constructed on undeveloped land. Only Farmland of Local Importance is located within the Eastern Project Impact Area (PIA), which is dominated by low-density residential development. Because the land within the vicinity of the Eastern PIA is already committed to non-agricultural uses (developed with residences and associated infrastructure), no viable farmland would be compromised by completion of the roadway consistent with the City's General Plan 2025. Therefore, because the land is already committed to non-agricultural uses, Scenario 3 would not result in the conversion of farmland to a non-agricultural use. Impacts would be **less than significant**.

Scenario 4

Direct Conversion of Farmland

Similar to Scenario 3 above, only Farmland of Local Importance is located within the Eastern PIA; no State mapped Farmlands are within this area. In addition to the connection of Overlook Parkway, Scenario 4 would include construction of Proposed C Street west of Washington Street, as illustrated on Figures 2-13 and 2-16. The Proposed C Street would be extended approximately one mile north of the intersection of Overlook Parkway and Washington Street to the north and west, ending at the intersection of Madison Street and Victoria Avenue. The proposed alignment would include 88 feet of curb-to-curb improvements, including a 12-foot median, within a 100-foot right-of-way.

The Proposed C Street is located within areas identified on Figure 3.1-2 as containing Prime and Unique Farmland, as well as mapped Farmland of Local Importance. No Farmland of Statewide Importance lands would be directly impacted with the construction of the western improvements. Permanent impacts to FMMP-designated Farmland, as well as Farmland of Local Importance, are shown below in Table 3.1-2. As detailed above, the General Plan 2025, as well as Proposition R and Measure C, designate the Arlington Heights Greenbelt as important lands to be preserved for primarily agricultural and low-density residential uses (see Figure 3.1-2). Thus, the impacts in this analysis are compared in relation to the total acres within the Arlington Heights Greenbelt rather than the entirety of the Project vicinity.

TABLE 3.1-2
IMPACTS TO FMMP DESIGNATED FARMLAND AND FARMLAND OF LOCAL IMPORTANCE UNDER SCENARIO 4

FMMP Category	Total acres within Greenbelt	Permanent Impacts	Percent of Greenbelt Farmland Impacted
Prime	791.76	1.72	0.22%
Statewide Importance	883.27	0	0
Unique	1,187.56	2.11	0.18%
Local Importance	487.41	7.90	1.62%
	3,350.00	11.73	0.35%

The Proposed C Street would impact less than 12 acres within 3,350-acre Greenbelt. Thus, the total impact to important farmland within the Arlington Heights Greenbelt would be .35% which is less than one percent (see Table 3.1-2); therefore, direct impacts to agricultural resources would be less than significant due to the level of acres in the Project footprint relative to the total amount of important farmland and due to the fact that no Farmland of Statewide Importance would be affected.

Direct impacts to important farmland categories are not expected to affect the viability of surrounding farmland. The majority of the parcels transected by the proposed alignment of Proposed C Street are under the same ownership; therefore, existing access between agricultural fields would not be constrained or eliminated with construction of the roadway. Overall, impacts associated with the direct conversion of farmland would be **less than significant**.

Indirect Conversion of Farmland

A potentially significant indirect impact to agricultural resources would occur if the Project would result in compatibility conflicts with existing agricultural activities. Land use/agricultural interface issues could arise from dust, noise, liability concerns, trespassing, theft, competition for water, and conflicts with pesticide use. The type of agricultural use and the sensitivity of the nearby land uses are key considerations in determining agricultural compatibility. As an example, orchard crops would be more likely to be compatible with surrounding residential uses than a confined animal feeding operation. In addition, if a sensitive use, such as a school, is proposed within one mile of an existing agricultural operation or land under contract, land use/agricultural interface conflicts could increase.

The Proposed C Street would be located west of Washington Street in an area that is generally agricultural in character and is designated as a Greenbelt by the General Plan 2025. Active agricultural activities within the Western PIA include an orchard, row crops, and a nursery operation.

The active agricultural activities are currently in proximity to roadways such as Washington Street, Victoria Avenue, Madison Street, and Dufferin Avenue. These streets all surround the Western PIA. Under Scenario 4, both Washington Street and Dufferin Avenue would be vacated in several sections (see Figure 2-16). Thus, the Proposed C Street would, in effect, be replacing these vacated streets in order to provide a connection to Madison Street, which eventually leads to State Route 91 (SR-91). The Proposed C Street would not add trips but would redistribute traffic (and its associated secondary impacts) that already occur on the existing roadways in this area. Because portions of roadways would also be vacated, certain nursery operations could be relocated. These changes would not introduce new sensitive uses or preclude or conflict with the agricultural operations in this area.

Conversely, the existing agricultural operations would not cause public safety impacts for future motorists/cyclists/pedestrians that would use the Proposed C Street. As discussed in Section 3.11, Traffic/Transportation, signage would be installed along the Proposed C Street that would indicate that agricultural operations occur within the area. Overall, impacts associated with the indirect conversion of farmland would be **less than significant**.

Off-site

The Traffic Impact Analysis (TIA) prepared for the proposed Project identifies measures to mitigate potentially significant traffic impacts within the Project vicinity. Measures consist of improvements such as signalization, restriping, and repaving for additional turn lanes at key intersections. These improvements would occur in developed areas and would have **no impact** on farmland conversion to non-agricultural use.

3.1.4.2 Significance of Impacts

No impacts to Farmlands (e.g., Prime, Unique, or Farmland of Statewide Importance) would be associated with Scenarios 1 and 2.

Under Scenario 3, Overlook Parkway would be completed within a designated corridor outside of any agricultural land, as established by and analyzed under the General Plan 2025, and no viable farmland would be converted. There would be no direct impacts to Farmland because there are no State mapped Prime, Unique, or Farmland of Statewide Importance lands within the PIA for Scenario 3.

Under Scenario 4, Overlook Parkway would be completed within a designated corridor outside of any agricultural land, as established by the General Plan 2025, and Proposed C Street also would be constructed west of Washington Street through the Arlington Heights Greenbelt. Impacts to Farmlands (e.g., Prime, Unique, or Farmland of Statewide Importance) would be less than significant because Scenario 4 would not directly or indirectly convert the surrounding agricultural operations to a non-agricultural use.

No impacts would occur from implementation of off-site improvements.

3.1.4.3 Mitigation, Monitoring, and Reporting

No mitigation would be required.

3.1.5 Issue 2: Conflict with Zoning or Williamson Act Contract

Would the proposed Project conflict with existing zoning for agricultural use, or a Williamson Act contract?

3.1.5.1 Impact Analysis

Scenario 1

Under Scenario 1, the gates at both Crystal View Terrace and Green Orchard Place would remain closed, no improvements would occur, and Overlook Parkway would remain in its present condition. Implementation of Scenario 1 would not result in the rezoning of any land within the Project vicinity.

With respect to Williamson Act Contract lands, while there are four parcels under Williamson Act Contract within the Project vicinity, none of the existing contracts would be affected (e.g., breach of contract, non-renewal, or cancellation) with the implementation of Scenario 1. This is ensured by the fact that no roadways or expansion of rights-of-way are proposed under this scenario. Therefore, Scenario 1 would not result in a conflict with existing zoning for agricultural use, nor result in the breach, non-renewal, or cancellation, of a Williamson Act Contract. There would be **no impact.**

Scenario 2

Under Scenario 2, the gates at both Crystal View Terrace and Green Orchard Place would be removed, allowing traffic to pass through the existing residential communities. Implementation of Scenario 2 would not result in the rezoning of any land within the Project vicinity.

Because no roadway extensions or expansion of rights-of-way are proposed under this scenario, none of the existing contracts would be affected (e.g., breach of contract, non-renewal, or cancellation).

Therefore, Scenario 2 would not result in a conflict with existing zoning for agricultural use, nor result in the breach, non-renewal, or cancellation of a Williamson Act Contract. There would be **no impact.**

Scenario 3

Under Scenario 3, Overlook Parkway would be constructed, as planned under the General Plan 2025, over the Alessandro Arroyo and continuing easterly to Alessandro Boulevard. The fill crossing and bridge segment over the Alessandro Arroyo would be constructed on undeveloped land. Land located within the Eastern and Arroyo PIAs is zoned RC-Residential Conservation Zone, which is applied to prominent ridgelines, hilltops and hillsides, slopes, arroyos, ravines and canyons, and other areas with high visibility or topographic conditions that warrant sensitive development. No lands with agricultural zoning are located within proximity of the improvements proposed under Scenario 3.

With respect to Williamson Act Contract lands, the four parcels under Williamson Act Contract within the Project vicinity are west of Washington Street, beyond the area where the crossings would be constructed for Scenario 3. None of the existing contracts would be affected (e.g., breach of contract, non-renewal, or cancellation) with the implementation of Scenario 3. Therefore, this scenario would not result in a conflict with existing zoning for agricultural use, nor result in the breach, non-renewal, or cancellation of a Williamson Act Contract. There would be **no impact.**

Scenario 4

Under Scenario 4, in addition to the connection of Overlook Parkway, the Proposed C Street westerly from Washington Street would be constructed through the Arlington Heights Greenbelt and over the Gage Canal. The Proposed C Street would be located in the northernmost portion of the Greenbelt near existing roadways. The Project vicinity west of Washington Street, surrounding the Proposed C Street alignment, is generally agricultural in character, designated as a Greenbelt by the General Plan 2025, and is zoned RA-5, Residential Agricultural Zone, pursuant to Proposition R.

The Proposed C Street is intended to facilitate the movement of traffic from the residential areas in the center of the City to the western portion of the City and SR-91, northwest of the Project vicinity. The implementation of Scenario 4 would not directly result in the rezoning of any land within the Project vicinity, and land within the Greenbelt would retain its RA-5 zoning, consistent with the agricultural preservation provisions established by Proposition R and Measure C. Implementation of Scenario 4 would not indirectly result in the rezoning of any land within the Project vicinity. Rezoning within the Greenbelt could only occur upon the repeal of Proposition R and Measure C, which requires a citywide referendum. Additionally, some of the existing street right-of-way would be vacated, and thus could revert to neighboring parcels, allowing approximately 1.1 acres of land to return to agricultural uses.

With respect to Williamson Act Contract lands, there are four parcels under Williamson Act Contract within the Project vicinity. The Proposed C Street would be located north and northeast of the parcels under contract. None of the existing contracts would be affected with the implementation of Scenario 4, either directly due to roadway alignment, or indirectly due to an increase in traffic that has been estimated for those roadways adjacent to the contracted parcels. This is supported by the fact that the Williamson Act is an incentive program to property owners with lands under agriculture. It is unlikely that changes in the circulation would result in owners of these parcels to either file a notice of non-renewal or apply for cancellation of the contract, which would result in an increase in property taxes levied on the property. Therefore, Scenario 4 would not result in a conflict with existing zoning for agricultural use, nor result in the breach, non-renewal or cancellation of a Williamson Act Contract. Impacts would be **less than significant**.

Off-site

Off-site improvements include signalization, restriping, and repaving for additional turn lanes at key intersections. These improvements would not conflict with existing zoning for agricultural use, or a Williamson Act contract. **No impacts** are identified.

3.1.5.2 Significance of Impacts

No impacts would be associated with Scenarios 1 and 2.

Under Scenarios 3 and 4, Overlook Parkway would be completed to the east, as established by the General Plan 2025. Under Scenario 4, Proposed C Street also would be constructed, as established by the General Plan 2025. Impacts associated with a conflict with existing zoning for agricultural use; or resulting in a breach of contract, filing of a notice of non-renewal, or the application for a cancellation of a Williamson Act Contract, would be less than significant for the reasons detailed above.

No impacts would be associated with off-site improvements.

3.1.5.3 Mitigation, Monitoring, and Reporting

No mitigation would be required.

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