

## 5.2 AGRICULTURAL RESOURCES

The six components of the Project are:

- 1) Adoption and implementation of the General Plan;
- 2) Adoption and implementation of the revised Zoning Code;
- 3) Adoption and implementation of the revised Subdivision Code;
- 4) Adoption and implementation of an amendment to the Noise Code;
- 5) Adoption and implementation of the Magnolia Avenue Specific Plan; and
- 6) Adoption and implementation of the Citywide Design and Sign Guidelines.

Of the six project components, the Subdivision Code, Noise Code Amendment, and the Citywide Design and Sign Guidelines address site planning, building design and community aesthetics, rather than physical changes to the land, and are thus not considered to have impacts related to agricultural lands and will not be analyzed further in this Section. The Magnolia Avenue Specific Plan (MASP) implements the land uses identified in the General Plan and revised Zoning Code so all discussions which apply to the General Plan and Zoning Code also apply to the MASP. In addition, the MASP area does not include any designated Farmland. Therefore, impacts related to the adoption and implementation of the General Plan and the revised Zoning Code will be addressed herein.

The Project's actions (General Plan and Zoning Code) have the potential to directly and indirectly affect agricultural resources, including Prime Farmland, Unique Farmland, Farmland of Statewide Importance, and Williamson Act contract land by changing the land uses permitted on agriculturally protected lands. Pursuant to CEQA §21060.1, "agricultural land" means Prime Farmland, Farmland of Statewide Importance and Unique Farmland as defined by the United States Department of Agriculture, as modified for California by the Department of Conservation's Farmland Monitoring and Mapping Program (FMMP). For purposes of this analysis, the City also considers "farmland" to be land subject to a Williamson Act contract as well as land designated for agricultural use in the City's General Plan or Zoning Code.

The Agriculture Section of this EIR has been changed from the previously circulated EIR. In addition to the overall changes listed in the Project Description Section of this EIR, background information and analysis was added for the Planning Area. Information for all topics within this Section was verified and updated as necessary. A detailed listing, **Appendix I, Designated Farmland**, was added. Additional figures were added to better illustrate potential impacts and information about regional trends in agriculture was added.

This analysis focuses on the Project's potential impacts related to agriculture. Since an initial study was not prepared with the issuance of the Notice of Preparation, the focus of the following discussion is related to the potential impacts to the conversion of Farmland to non-agricultural uses, conflicts with Williamson Act contracts or existing zoning for agricultural use and other changes to the existing environment that could result in the conversion of farmland.

In addition to other reference documents, the following references were used in the preparation of this Section of the EIR:

- County of Riverside Transportation and Land Management Agency (TLMA) Geographic Information Systems, Agricultural Preserves Shapefile, 2004.
- Department of Conservation, Farmland Mitigation and Monitoring Program (FMMP). Riverside County, 2004.
- 2002 Census of Agriculture – Volume 1 Geographic Area Series Census, State – County Data – Riverside.
- 1997 Census of Agriculture – Volume 1 Geographic Area Series Census, State – County Data – Riverside.
- Riverside County Agricultural Crop and Livestock Report, 1990. (Available at [www.rivcoag.org/agdept/opencms/publications](http://www.rivcoag.org/agdept/opencms/publications))
- Riverside County Agricultural Crop and Livestock Report, 2002. (Available at [www.rivcoag.org/agdept/opencms/publications](http://www.rivcoag.org/agdept/opencms/publications))
- Riverside County Agricultural Crop and Livestock Report, 2005. (Available at [www.rivcoag.org/agdept/opencms/publications](http://www.rivcoag.org/agdept/opencms/publications))
- Riverside County Airport Land Use Compatibility Plan Policy Document. Riverside County Land Use Commission, October 2004.
- Riverside Local Agency Formation Commission, *LAFCO Policies & Procedure*, August 2004, Page 2.

## Setting

The citrus industry was the mainstay of Riverside’s economy starting in the late nineteenth century and continuing well into the twentieth. As recently as the mid 1950s, large areas of the City remained in citrus groves. The late twentieth century saw a significant increase in pressure to convert agricultural land to suburban uses. Nearly all of the Orangecrest area was in citrus production as late as the 1970s. Today, this area is completely developed with suburban uses. The same can be said for Hunter Business Park, a former citrus area slated for industrial use. The only significant block of agriculture in the City limits in the early twenty-first century is the Arlington Heights Greenbelt, in the south and central portion of the City. Even in this area, many of the citrus groves are being converted to wholesale nurseries.

Within the General Plan area, including the Sphere of Influence, citriculture is also found in the Highgrove, Woodcrest and Rancho El Sobrante areas. However, citrus groves in these areas are quickly being replaced by suburban residential development. Over the time frame of the General Plan, it is a distinct possibility that most, if not all, of the agriculture uses in the City and Sphere, with the exception of Arlington Heights, will be replaced with suburban uses. Because of the importance of citriculture as a visual amenity, open space resource and important source of civic

pride as part of the City's heritage, preservation of agriculture in the Arlington Heights Greenbelt will be of utmost importance as a City goal.

Agriculture represents a finite and unique resource that is an important part of the City of Riverside's history. The citrus industry was the mainstay of the City of Riverside's economy starting in the late nineteenth century and continuing well into the twentieth. The climate and soils were favorable to widespread commercial citrus crops. Historically, agriculture was the largest industry in Riverside County, providing employment for a significant portion of the City's population. During the late twentieth century, however, there was significant pressure to convert agricultural land to suburban use. Currently, agriculture faces continuing pressure from urbanization, foreign competition, and rising production and water costs. Numerous citriculture areas were completely converted to urban and suburban uses after the 1970s.

The region is experiencing rapid loss of farmland, contracted lands, and agriculture in general. In terms of dollar value, agriculture is today the largest industry in Riverside County, providing employment for a significant portion of the County's population. According to the Riverside County Agricultural Crop and Livestock Report, for every dollar received by farmers in Riverside County, the financial impact to the region is three times that amount. With crop valuations that have hovered around \$100,000,000 over the last ten years, it represents a tremendous economic benefit to the County. Currently, agriculture faces continuing pressure from urbanization, foreign competition, and rising production costs. Despite these pressures, those areas, which remain in agricultural production, represent a significant open space and economic resource for the County. As values of differing crops vary significantly, it is the loss of agricultural land that is the appropriate measure of whether significant environmental impacts related to agriculture are occurring.

In 1990, Riverside County had a total of 343,072 acres of harvested crops. In 2002, the total acres had dropped to 241,294 and by 2005 to 223,848 harvested acres. This represents a loss of 119,224 acres in 15 years (35 percent) with 14 percent of that loss (17,446 acres) occurring within the last four years (2002 through 2005). The Agricultural Commissioner's Office also reports these statistics for regions of the county, including the Riverside/Corona District, within which the project is located. For the same 2002 to 2005 timeframe, the Riverside/Corona District went from 21,600 harvested acres to 14,340 harvested acres; a reduction of 34 percent. This shows that the development pressure faced in the western end of the county where the City of Riverside is located is more rapid than in the county as a whole.

This EIR analyzes potential impacts to agricultural resources within the City and its Sphere areas in three categories: (1) Designated Farmland; (2) Williamson Act properties; and (3) land designated for agricultural use in the City's General Plan or Zoning Code. Each category is discussed below because the extent, configuration, and status of land within each category may vary, and because the differing categories may overlap.

### *Designated Farmland*

The preservation of agricultural resources and activities has been an explicit goal of the California Department of Conservation (CDC) and the United States Department of Agriculture

(USDA). As growth and urbanization continue, agricultural areas are converted, resulting in an overall loss in arable land to support agricultural activities, as well as valuable topsoil.

Congress enacted the Farmland Protection Policy Act (FPPA) to “...minimize the extent to which federal programs contribute to the unnecessary and irreversible conversion of farmland to nonagricultural uses...” (7 U.S.C. 4201(b), *et seq.*). The Natural Resource Conservation Service (NRCS) rates the agricultural suitability of soils in terms of both the Land Use Compatibility Classification System and the Storie Index. The Classification System shows the suitability of soils for most types of field crops according to their limitations, risk of damage when used, and the way they respond to treatment. The Storie Index expresses the suitability of soils for general intensive farming, based on characteristics of the soil. Based on the Storie Index, soils can be classified from Grade 1, considered excellent and very well suited to general intensive farming, to Grade 6, soils and miscellaneous areas not suited to farming. The FPPA requires Federal agencies to examine the impacts of their programs before they approve any activity that would convert farmland. However, the FPPA has no requirement for Federal agencies to alter projects to avoid or minimize farmland conversion.

Utilizing data from the U.S. Department of Agriculture (USDA), NRCS, soil survey and current land use information, the California Department of Conservation (CDC), Farmland Mapping, and Monitoring Program (FMMP), compiles important farmland maps. In 1982, the CDC 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. 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. It is important to note that the California Environmental Quality Act (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; **Figure 5.2-1, Designated Farmland**, depicts the State Department of Conservation designated areas for the City and Sphere areas:

- **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:** Lands of importance to the local agricultural economy, as determined by each county's board of supervisors and a local advisory committee.

- **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 U.C. Cooperative Extension.

Per 2004 FMMP data, **Figure 5.2-1**, represents approximately 3,401 acres of Prime Farmland, 2,716 acres of Farmland of Statewide Importance, 4,976 acres of Unique Farmland, 5,814 acres of Farmland of Local Importance and 7,275 acres of Grazing Land in the Planning Area (City and Sphere).

Most of the existing agricultural resources within the City of Riverside are southeast of Victoria Avenue on the south side of SR-91 in the Arlington Heights Greenbelt (see reference on **Figure 5.2-1**) that was traditionally planted with orange groves. Other areas of agricultural resources are scattered throughout the City, with concentrations located near Arlanza/La Sierra as well as the University of California at Riverside (UCR). Agricultural resources are also located in clusters in the Northern and Southern Sphere of Influence. Limited areas of grazing land are located within the City west of Fillmore Street on the west edge of the City boundary, as well as within the Southern Sphere.

#### *Williamson Act Lands*

There are two Williamson Act preserve areas within the City limits: one parcel within Hunter Business Park along the City border near the northeast part of the City at the intersection of Columbia Avenue and Michigan Avenue, and four parcels south of SR-91 and west of the intersection of Overlook Parkway and Washington Street (see **Figure 5.2-2, Williamson Act Preserves** for locations of these contracted parcels). The preserve areas within the City are under active contracts that were approved for an initial ten-year term and that are subject to an automatic annual renewal. Riverside County indicates that there are numerous Williamson Act parcels within the Sphere Area (County of Riverside TLMA Geographic Information System, 2006). The active preserve areas within the City's Sphere of Influence include El Sobrante No. 1, El Sobrante No. 2, El Sobrante No. 3, El Sobrante No. 14, Highgrove No. 1, Woodcrest No. 3, Woodcrest No. 4, Woodcrest No. 5 and Woodcrest No. 7. The status of the lands within County preserve areas include parcels in active agricultural/open space use within the El Sobrante and Highgrove Preserves, parcels that have filed for notices of non-renewal within the Woodcrest Preserves, and parcels that have completed their notice of non-renewal periods, but where a diminishment of the agricultural preserve has not been initiated and/or completed as in the case of the Highgrove and Woodcrest Preserves. Williamson Act preserves in the Sphere Area are shown on **Figure 5.2-2, Williamson Act Preserves**.

#### *Zoning and General Plan Designations*

**Figure 5.2-3, Existing Zones Permitting Agricultural Uses** depicts the areas in the City and Sphere that currently have zoning, which allows agricultural (i.e. horticulture, farms, field crops, orchards) uses. The current zoning in the City allows agriculture in various residential zones. The areas zoned for residential uses shown on **Figure 5.2-3**, represent the majority of the City, which is currently built-out. Because of this, it is not expected that agriculture activities will take place on a large scale within the existing City limits.

**Figure 5.2-4, Proposed Zones Permitting Agricultural Uses** depicts the areas in the City and Sphere that under the City’s Zoning Code updates will allow for agricultural uses. The majority of the areas zoned to currently allow agriculture will remain as such under the proposed zoning updates.

**Figure 5.2-5, Existing General Plan Land Use Designations Permitting Agricultural Uses** depicts the areas under the City’s 1994 General Plan that allow for agricultural uses, as well as areas in the Sphere and their current City General Plan Designations.

**Figure 5.2-6, Proposed General Plan Land Use Designations Permitting Agricultural Uses** depicts the areas that with implementation of the proposed General Plan would allow agriculture to occur for the Planning Area. Under the City’s proposed General Plan, the majority of the Southern Sphere area allows for agricultural uses.

### **Thresholds of Significance**

The City of Riverside has not established local CEQA significance thresholds as described in Section 15064.7 of the State CEQA Guidelines. Therefore, significance determinations utilized in this Section are from Appendix G of the CEQA Guidelines. A significant impact will occur if implementation of the Project:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use; or
- Conflict with a Williamson Act contract or existing zoning for agricultural use; or

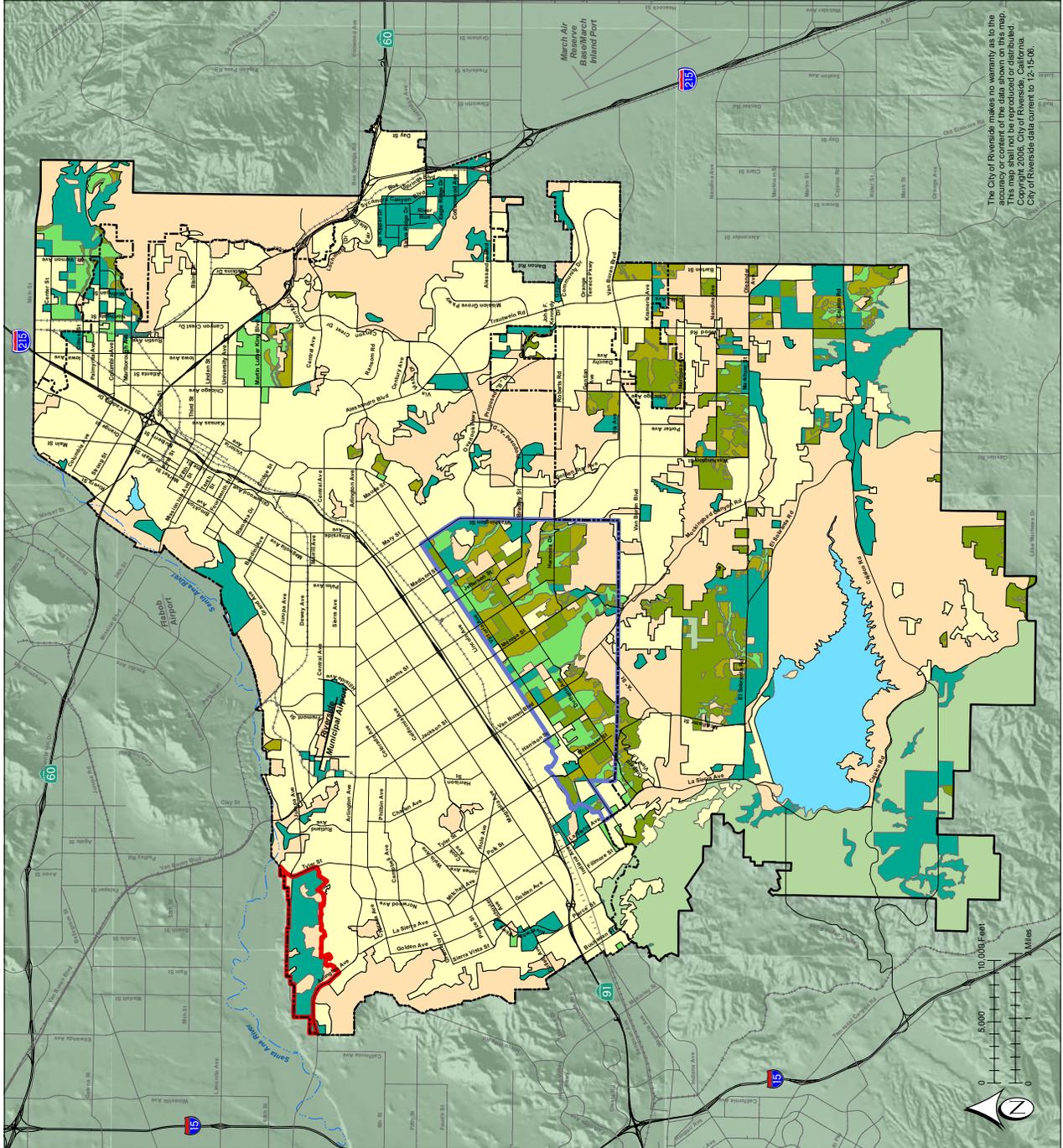
Involve other changes in the existing environment, which could result in conversion of Farmland to non-agricultural use.



**LEGEND**

- D** URBAN AND BUILT-UP LAND
- G** GRAZING LAND
- L** FARMLAND OF LOCAL IMPORTANCE
- P** PRIME FARMLAND
- S** FARMLAND OF STATEWIDE IMPORTANCE
- U** UNIQUE FARMLAND
- W** WATER
- X** OTHER LAND
- ARLANZA-LA SIERRA AGRICULTURAL AREA**
- ARLINGTON HEIGHTS GREENBELT**
- RIVERSIDE CITY BOUNDARY**
- RIVERSIDE PROPOSED SPHERE OF INFLUENCE**

SOURCE: CALIFORNIA DEPARTMENT OF CONSERVATION, FARMLAND MAPPING AND MONITORING PROGRAM, 2004



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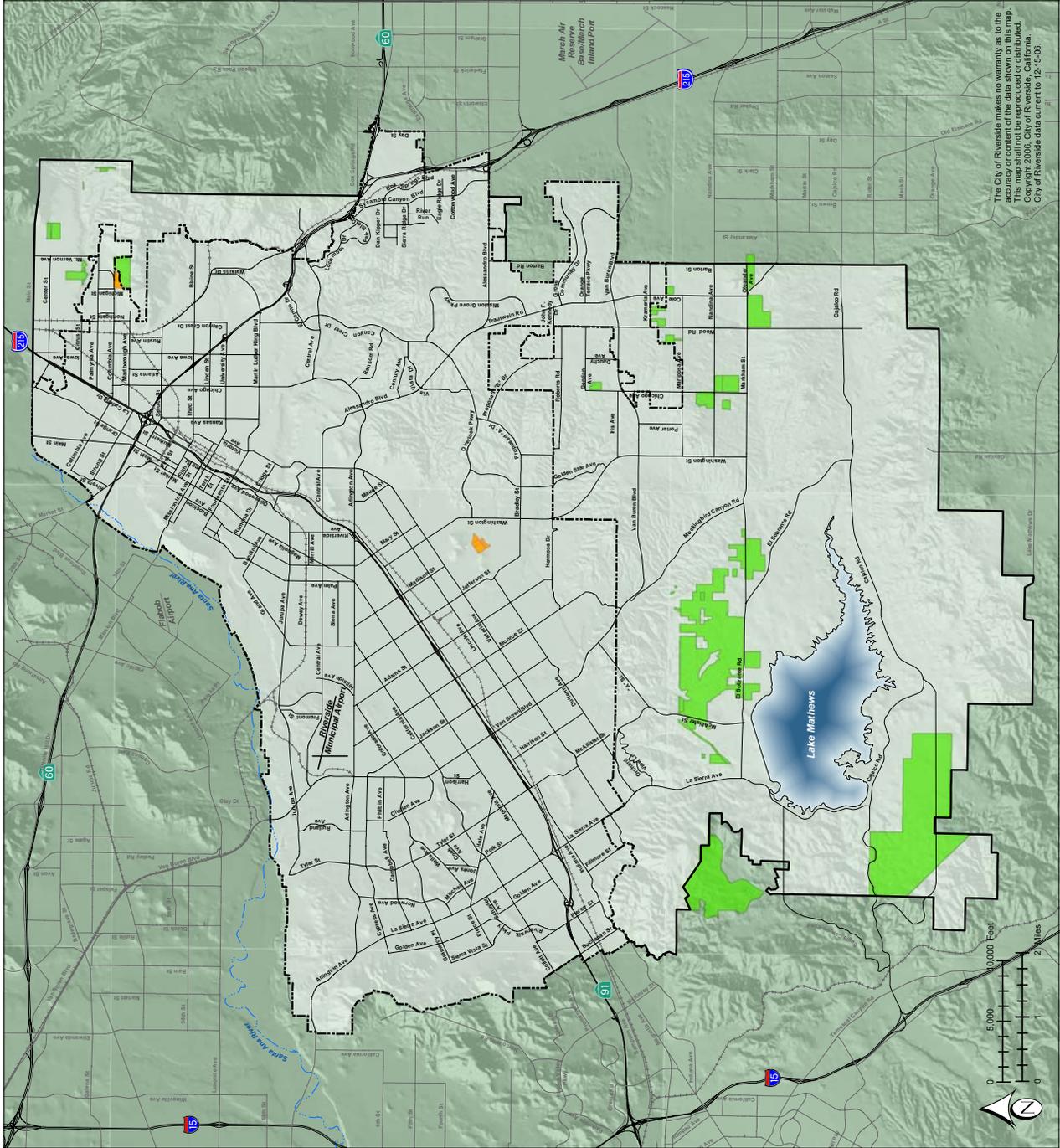
**Figure 5.2-1  
DESIGNATED  
FARMLAND**



**LEGEND**

- WILLIAMSON ACT PRESERVE AND CONTRACTED LAND
- WILLIAMSON ACT PRESERVE
- RIVERSIDE CITY BOUNDARY
- RIVERSIDE PROPOSED SPHERE OF INFLUENCE

SOURCE: RIVERSIDE COUNTY GIS DATA, AS UPDATED BY CITY STAFF FEBRUARY 2007



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Figure 5.2-2  
**WILLIAMSON ACT PRESERVES**

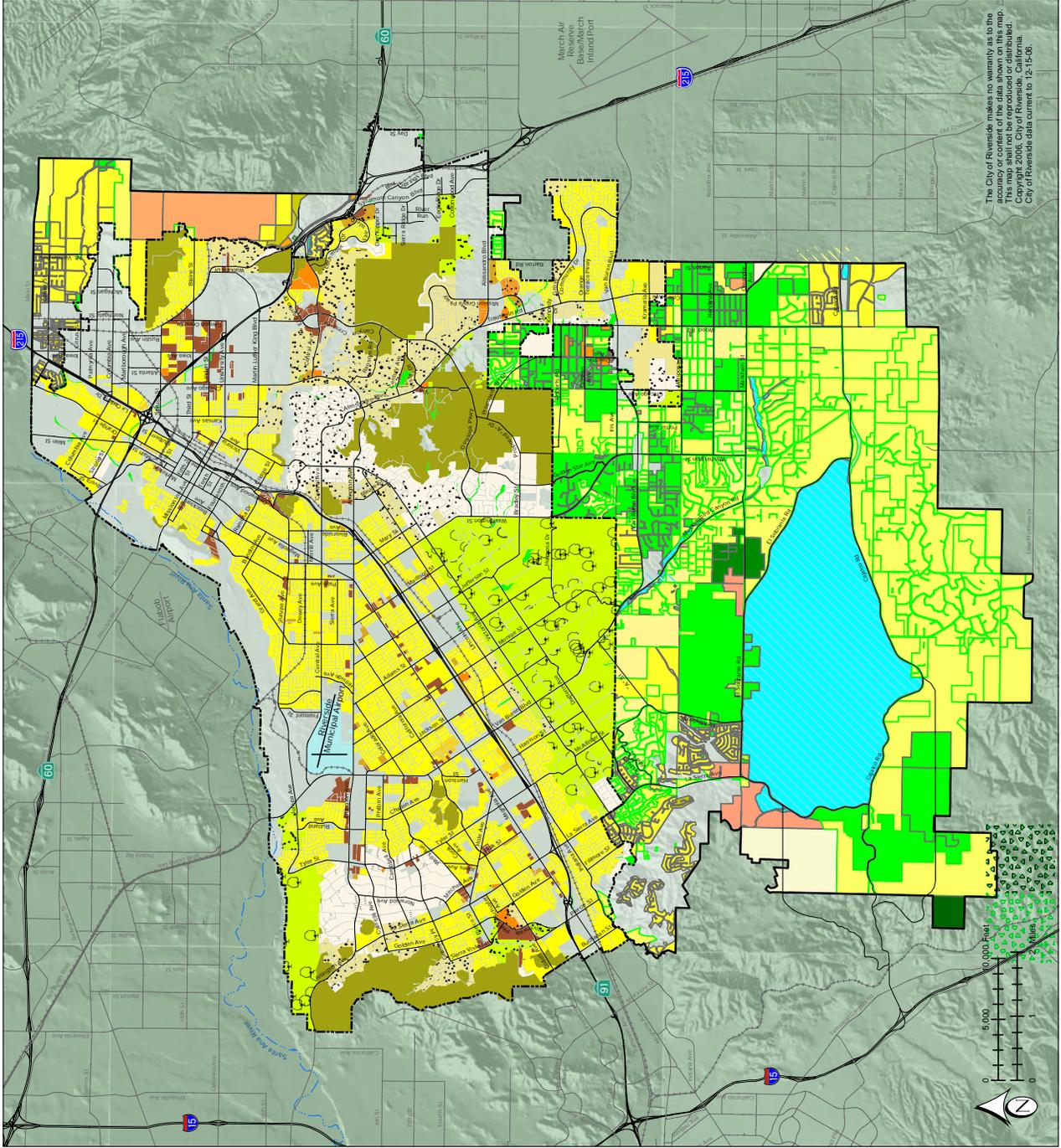
## Related Regulations

### *California Land Conservation Act, 1965*

The California Land Conservation Act of 1965, also known as the Williamson Act (Government Code Section 51200 *et seq.*), defines prime agricultural soils as any one of the following soils which have capability groupings of Class I or II: soils which have Storie Index ratings of 80 to 100; land supporting livestock equivalent to a minimum of one animal unit per 0.405 ha (one acre); or land planted with fruit or nut bearing vegetation producing not less than \$81 per ha (\$200 per acre) annually (Government Code Section 51201[C]). The Williamson Act was adopted as an incentive program, encouraging the preservation of the State’s agricultural lands. As a means to implement the Act, a land contract is established, whereby a county board of supervisors or city council stabilizes the taxes on qualifying lands in return for an owner’s guarantee to keep the land in agricultural preserve status for a 10-year period. Each year, on its anniversary date, the contract is automatically renewed unless a notice of non-renewal is filed.

As a general rule, land can be withdrawn from Williamson Act contract only through the nine-year nonrenewal process. Immediate termination via cancellation is reserved for “extraordinary,” unforeseen situations. Nonrenewal is the preferred approach to removing a parcel from a Williamson Act contract. If a cancellation is proposed for any reason, the following procedure and statutes apply.

When the City (or other responsible jurisdiction) accepts an application for a development project as complete pursuant to Government Code Section 65943, the City Council must immediately mail a notice to the Director of the Department of Conservation pursuant to the requirement of Government Code Section 51284.1. Government Code Section 51284.1 (d) requires the City Council (or other responsible jurisdiction) to consider the comments by the Director of Conservation, if submitted, prior to acting on the proposed cancellation. Notification must be submitted separately from the CEQA process and CEQA documentation. To approve a cancellation, the City Council must find that the cancellation is either: (1) consistent with the purposes of the Williamson Act, or (2) in the public interest. (Gov. Code, Section 51282, *dubd.* (a).)



**LEGEND**

**CITY ZONING**

- R-1-100
- R-1-125
- R-1-130
- R-1-65
- R-1-80
- R-2
- R-3
- R-3-20
- R-3-30
- R-3-40
- R-3-R
- RA
- RA-5
- RC
- RR
- WC
- AIR

**COUNTY ZONING**

- A-1
- A-2
- A-D
- A-P
- C-CV
- M-R
- M-R-A
- N-A
- R-1
- R-1A
- R-2
- R-2A
- R-3
- R-3A
- R-A
- R-D
- R-R
- R-T-R
- W-1
- W-2
- W-2-M

- RIVERSIDE CITY BOUNDARY
- RIVERSIDE PROPOSED SPHERE OF INFLUENCE

SOURCE: CITY OF RIVERSIDE; COUNTY DATA 2006, CITY ZONING CODE AND COUNT ORDINANCE NO. 348

**Figure 5.2-3  
EXISTING ZONES  
PERMITTING  
AGRICULTURAL USES**

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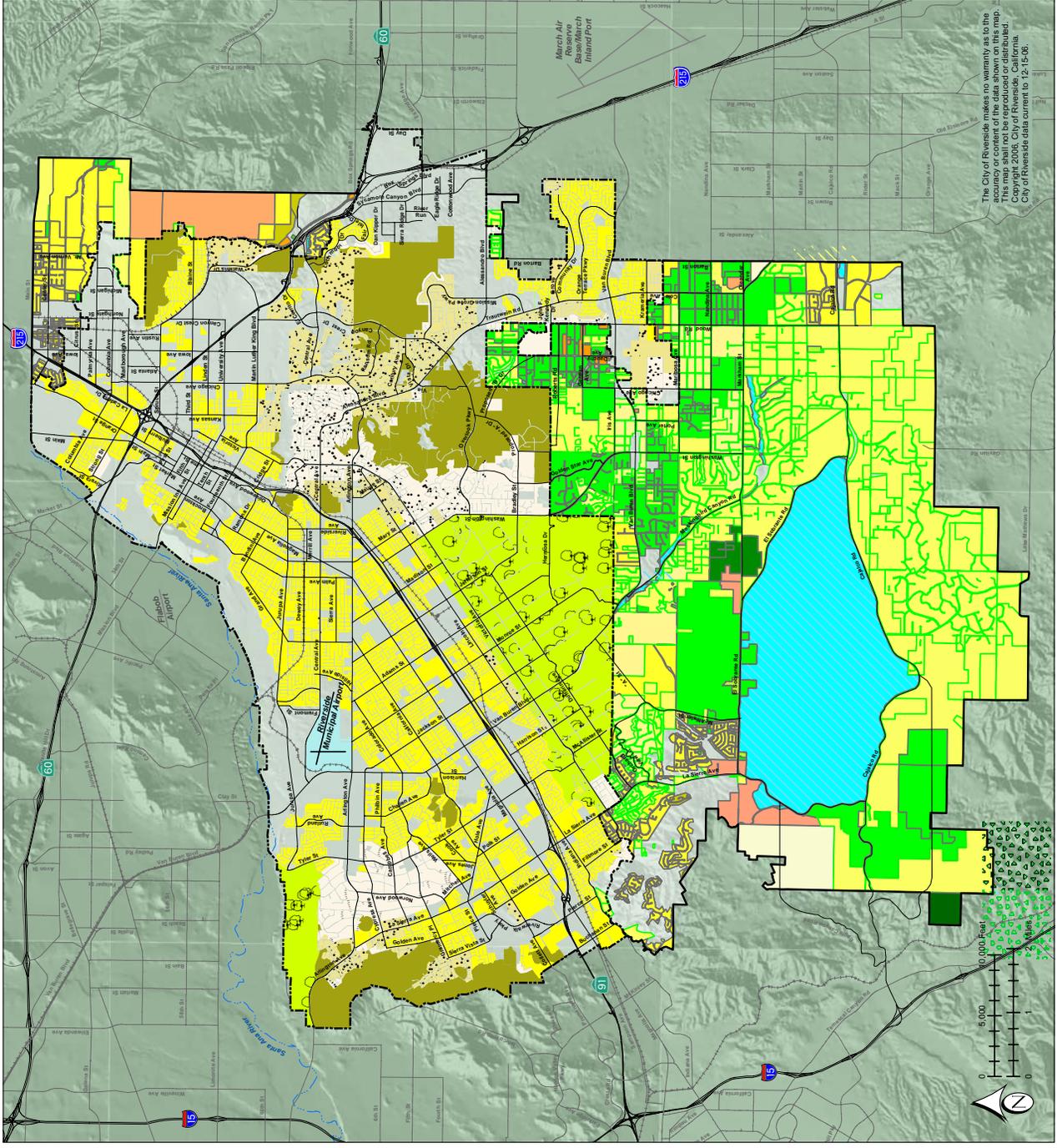


**LEGEND**

- |                         |                      |
|-------------------------|----------------------|
| <b>CITY ZONING 2025</b> | <b>COUNTY ZONING</b> |
| RC                      | A-1                  |
| RA-5                    | A-2                  |
| RR                      | A-D                  |
| R-1-1/2 acre            | A-P                  |
| R-1-13000               | C-CV                 |
| R-1-10500               | M-R                  |
| R-1-8500                | M-R-A                |
| R-1-7000                | N-A                  |
| AIR                     | R-1                  |
|                         | R-1A                 |
|                         | R-2                  |
|                         | R-2A                 |
|                         | R-3                  |
|                         | R-3A                 |
|                         | R-A                  |
|                         | R-D                  |
|                         | R-R                  |
|                         | R-T-R                |
|                         | W-1                  |
|                         | W-2                  |
|                         | W-2-M                |
- - - - RIVERSIDE CITY BOUNDARY  
 — RIVERSIDE PROPOSED SPHERE OF INFLUENCE

SOURCE: CITY OF RIVERSIDE, COUNTY DATA 2006, CITY ZONING CODE AND COUNTY ORDINANCE NO. 348

**Figure 5.2-4  
PROPOSED ZONES  
PERMITTING  
AGRICULTURAL USES**





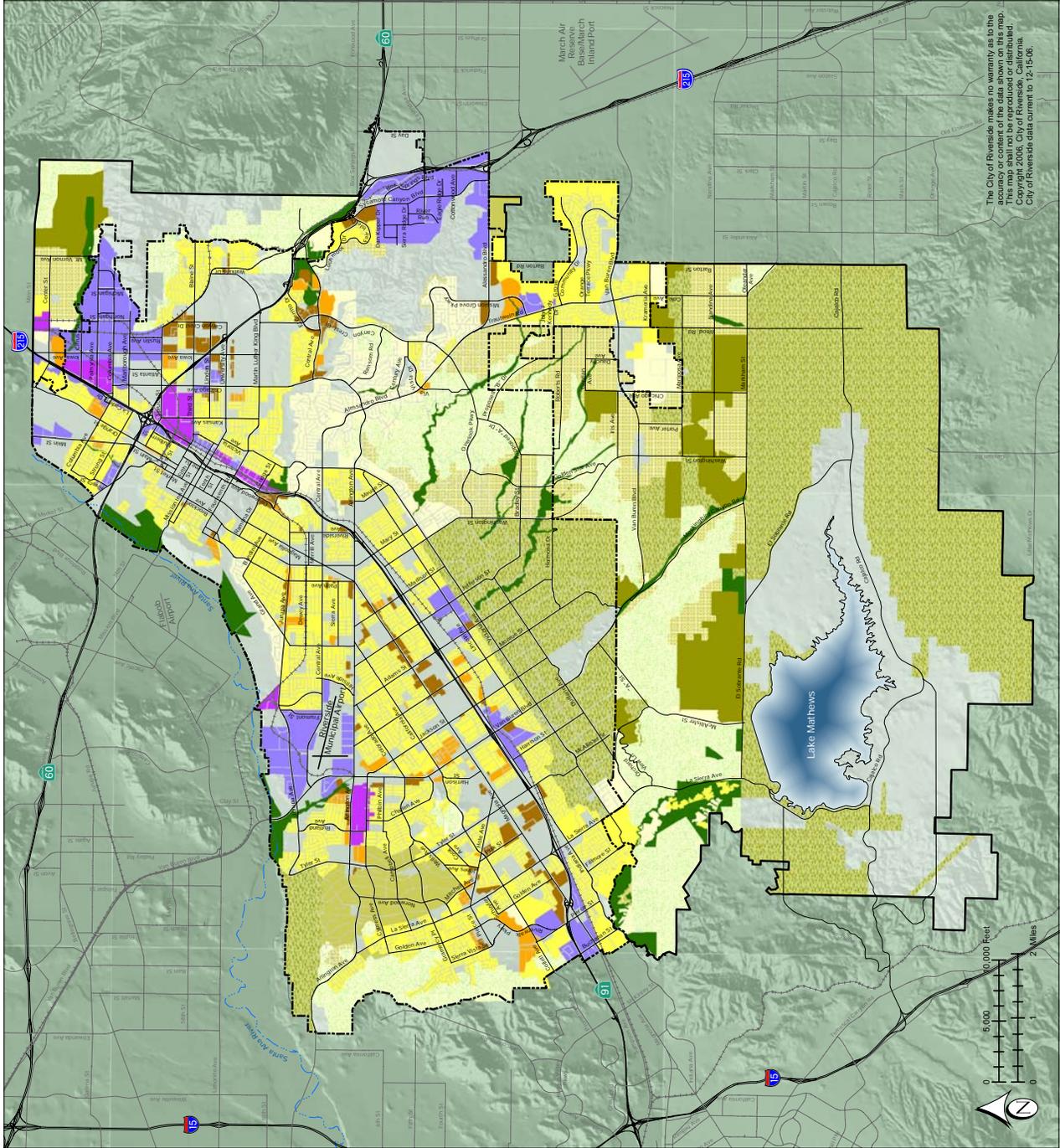
**LEGEND**

**GENERAL PLAN LAND USE**

- RES - Residential - Estate
- AGR - Agriculture
- RAR - Residential - Rural and Residential
- RHS - Residential Hillside
- RSR - Residential - Semi-Rural
- RLD - Residential - Low Density
- RMD - Residential Medium Density
- RMH - Residential Medium-High Density
- RHD - Residential High Density
- IBP - Industrial - Business Park
- IGN - Industrial - General
- NOS - Natural Open Space
- RIVERSIDE CITY BOUNDARY
- RIVERSIDE PROPOSED SPHERE OF INFLUENCE

NOTE: NOS CATEGORY APPLIES MAINLY TO THOSE PROPERTIES IN THE FLOOD PLAIN

SOURCE: CITY OF RIVERSIDE, GENERAL PLAN 1994



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**Figure 5.2-5  
EXISTING GENERAL  
PLAN LAND USE  
DESIGNATIONS PERMITTING  
AGRICULTURAL USES**



**LEGEND**

PROPOSED GENERAL PLAN LAND USE

A - AGRICULTURAL

ARR - AGRICULTURAL/RURAL RESIDENTIAL

HR - HILLSIDE RESIDENTIAL

SRR - SEMI RURAL RESIDENTIAL

VLDR - VERY LOW DENSITY RESIDENTIAL

LDR - LOW DENSITY RESIDENTIAL

MDR - MEDIUM DENSITY RESIDENTIAL

I - INDUSTRIAL

OS - OPEN SPACE/NATURAL RESOURCES

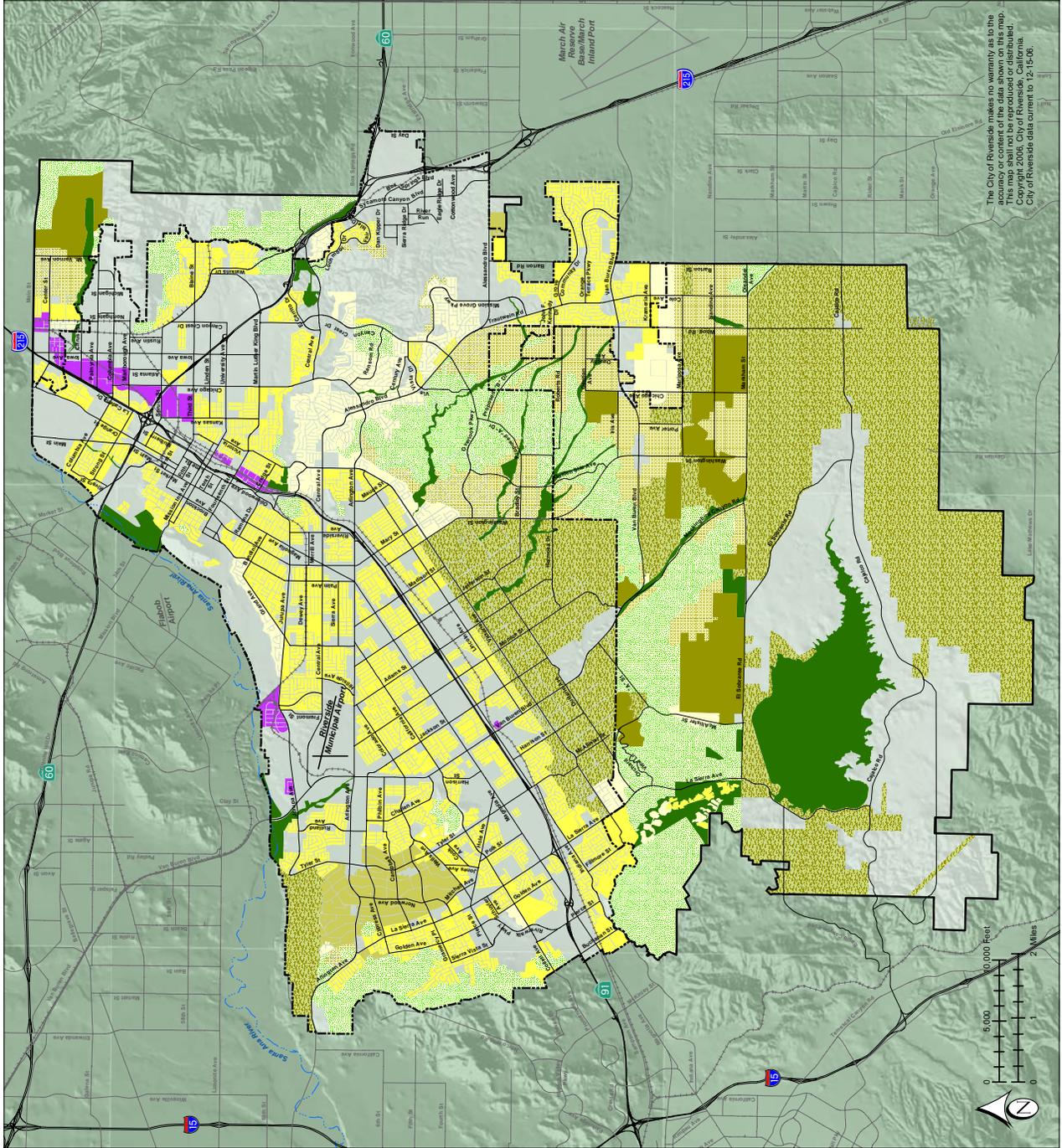
--- RIVERSIDE CITY BOUNDARY

— RIVERSIDE PROPOSED SPHERE OF INFLUENCE

NOTE: OS CATEGORY APPLIES MAINLY TO THOSE PROPERTIES IN THE FLOOD PLAIN

SOURCE: CITY OF RIVERSIDE, PROPOSED GENERAL PLAN 2025

**Figure 5.2-6  
PROPOSED GENERAL  
PLAN LAND USE  
DESIGNATIONS PERMITTING  
AGRICULTURAL USES**



To support a finding that the cancellation is consistent with the purposes of the Act, the City Council must make the following findings:

- (b)(1) the owner of the land has already served a notice of nonrenewal of the contract,
- (b)(2) the cancellation is not likely to result in the removal of adjacent lands from agricultural use,
- (b)(3) the cancellation is for an alternative use, which is consistent with the applicable provisions of the relevant General Plan,
- (b)(4) the cancellation will not result in discontinuous patterns of urban development, and
- (b)(5) there is no proximate noncontracted land, which is both available and suitable for the proposed alternative use of the land, or development of the land would provide more contiguous patterns of urban development. (Gov. Code, Section 51282, subd. (b).)

To support a finding that the cancellation is in the public interest, the City Council must find:

- (c)(1) other public concerns substantially outweigh the objectives of the Williamson Act, and
- (c)(2) there is no proximate noncontracted land, which is both available and suitable for the proposed alternative use of the land, or development of the land would provide more contiguous patterns of urban development. (Gov. Code, Section 51282, subd. (c).)

Pursuant to Government Code Section 51243, if the City annexes land under Williamson Act contract, the City must succeed to all rights, duties and powers of the County under contract. A LAFCO must notify the Department of Conservation within 10 days of the City's proposal to annex land under Williamson Act contract (Government Code Section 56753.5). A LAFCO must not approve a change to a sphere of influence or annexation of contracted land to the City unless specified conditions apply (Government Code Sections 51296.3, 56424, 56426.5, 56749 and 56856.5).

Termination of a Williamson Act contract by acquisition can only be accomplished by a public agency having the power of eminent domain, which is used for a public improvement. Requirements of Government Code Section 51290 - 51292 apply and specific findings must be made.

#### *LAFCO Policies*

The Local Agency Formation Commission (LAFCO) addresses Prime agricultural land with an objective, which aims to preserve the physical and economic integrity of agricultural lands. Policies related to this objective discourage or recommend denying annexation of Prime agricultural land. According to LAFCO Policy 1.2.1, the City of Riverside General Plan should facilitate orderly development patterns, which allow continued operation of agricultural uses. Policy 1.2.2 sets criteria to be met in order for LAFCO to approve annexation for property

located within an agricultural preserve. The criteria include the filing of a Notice of Non-renewal or Cancellation on any property under Williamson Act Contract, which is being proposed for annexation. It also requires, much like Policy 1.2.1 that the City's General Plan allows for effective and continued agricultural uses, and provides a guideline for the ultimate development of agricultural land. Under this policy, the loss of non-agricultural land should not be considered an issue when a county or city general plan provides for urban development and the proposal would not impact the integrity of the surrounding prime agricultural lands.

### *Proposition R and Measure C*

In 1979, City of Riverside voters passed Proposition R: "Taxpayer's Initiative to Reduce Costly Urban Sprawl by Preserving the City of 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: 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: 1) the Arlington Heights Greenbelt; and 2) an area commonly known as the Arlanza-La Sierra Lands, a bluff top area above the Santa Ana River bordered by Tyler Street on the east and Arlington Avenue on the west. The Arlington Heights Greenbelt and the Arlanza-La Sierra Lands are shown in **Figure 5.2-1, Designated Farmland**.

Eight years later, City of Riverside voters approved Measure C as 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 the City of Riverside's Citrus and Agricultural Lands, its Scenic Hills, Ridgelines, Arroyos and Wildlife Areas." Measure C amended Proposition R by adding policies to promote agriculture. Measure C relates to the Arlington Heights Greenbelt, the Arlanza-La Sierra Lands and any areas designated for agricultural use in the then existing General Plan or Zoning Code (see **Figure 5.2-3, Existing Zones Permitting Agricultural Uses**). In summary, Measure C promotes the preservation of agricultural uses in these areas by:

- Ensuring that the Gage Canal water is reserved for agricultural use 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;
- 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.

Proposition R and Measure C provide special protections for the City's hillside areas and the City is committed to fulfilling the terms of both Proposition R and Measure C (see General Plan Open Space Policy OS-4.1.). In fact, it is the City's stated objective to minimize the extent of urban

development in the greenbelt and hillside areas, and mitigate any adverse impacts associated with urbanization. The City will not, and legally cannot, without a vote of the residents of the City amend Proposition R and Measure C.

It should be noted that Proposition R and Measure C only apply to limited areas of the City. Numerous policies in the General Plan are intended to provide general guidance to the City as a whole. Proposition R and Measure C provide more specific development guidance than the general policies in the General Plan. They implement the General Plan's goals and policies by establishing regulations that describe which goals and policies can be achieved in the hillside and greenbelt areas of the City. To the extent that general policies in the General Plan are inconsistent with the purpose and intent of Proposition R and Measure C, the more specific policies in Proposition R and Measure C will take precedence over the General Plan related to the City's greenbelt areas.

### **Related General Plan Policies**

Implementation of the following General Plan policies will assist in minimizing adverse impacts to agriculture for the benefit of the City. To reduce direct, indirect, and cumulative impacts on agricultural resources, the Project includes, objectives, policies and tools that will retain, protect and encourage agricultural land use. The following objectives and policies encourage the implementation of Proposition R and Measure C, preservation and protection of agricultural land through assistance programs, development of agricultural zones, transfer of development rights and leases to UCR, and development of suitable buffers around agricultural uses to prevent incompatible land uses adjacent to agricultural uses and water subsidies.

#### ***Greenbelt and Agricultural Uses***

**Objective LU-6: Retain functional agricultural areas within Riverside, particularly within the greenbelt area, while allowing for sensitive, low-intensity residential uses.**

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.

Policy LU-6.3: Protect and maintain the Arlington Heights Greenbelt agricultural character through adherence with applicable provisions of the Subdivision and Zoning Codes in addition to Proposition R and Measure C.

Policy LU-6.4: Review development within agricultural areas to encourage efficient land use and facilitate long-term perpetuation of citrus stock.

Policy LU-6.5: Encourage the potential relocation of the University of California, Riverside's experimental citrus groves to one or more locations within the Arlington

Heights neighborhood to help the neighborhood retain its agricultural character.

### ***La Sierra Acres***

Policy LU-63.5: Implement the Rancho La Sierra Specific Plan pursuant to Proposition R and Measure C with the following criteria:

- Housing shall be clustered to protect the river bottom wildlife refuge, the agricultural lands along the river bluffs and the open-space character of the areas;
- Natural open space areas shall be preserved to protect the natural features of the site such as significant natural hills, steep slopes, rock outcroppings, and arroyos;
- The wildlife refuge, agricultural land, and open space character of the river shall be preserved;
- Any future roads or utility service shall be located so as to protect the wildlife refuge; and
- Public trail access along the river corridor compatible with protection of the wildlife refuge shall be maintained and provide for hiking, bicycling and equestrian use.

### ***Agricultural Preservation – Proposition R and Measure C***

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-3.3: Protect valuable agricultural land from urban development through the use of agricultural zones and other appropriate development regulations, as well as financial and tax incentives.

Policy OS-3.4: Encourage property owners to preserve citrus groves and implement public programs to provide incentives and other assistance to promote and protect citrus farming on prime agricultural lands.

Policy OS-3.5: Consider strategies to enhance the productivity of the local agricultural industry, such as the creation of special electric and water rate structures and the establishment of an interest subsidy program for loans used for fencing, screening, and replanting of agricultural lands.

- Policy OS-3.6: Support alternative allowable uses, such as crop diversification, within historic citriculture areas where such uses will retain the agricultural use and character of the areas.
- Policy OS-3.7: Evaluate various proactive programs for agricultural preservation such as transfer of development rights, purchase lease back, University purchase for research and purchase of development rights, on a case-by-case basis.
- Policy OS-3.8: Recognize Agricultural Conservation Areas adopted by Riverside County pursuant to the Williamson Act in planning for future development and possible annexation of areas within the City’s sphere of influence.
- Policy OS-3.9: Coordinate programs to preserve agricultural lands with other public, private and non-profit organizations where feasible.
- Policy OS-3.10: Continue to work with the State to promote and expand the California Citrus State Historic Park.
- Policy OS-3.11: Explore the creation of an incentive program for the conservation of agricultural lands.
- Policy OS-4.1: Continue to enforce Proposition R and Measure C.
- Policy OS-4.2: Establish buffers and/or open space between agricultural and urban uses so that impacts from urban development can be mitigated.
- Policy OS-4.3: Explore the possibility of establishing a fee for all new development in Riverside for land banking to create new buffers and/or purchase sensitive lands between urban development and existing open space resources.

## **Environmental Impacts Before Mitigation**

***Threshold:** Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use.*

### *General Plan and Zoning Code Revision*

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 (CDC). Per 2004 Department of Conservation data, the Planning Area (City and Sphere Area) as depicted on **Figure 5.2-1**, represents approximately 3,401 acres of Prime Farmland, 2,716 acres of Farmland of Statewide Importance, 4,976 acres of Unique Farmland, 5,814 acres of Farmland of Local Importance and 7,275 acres of Grazing Land.

The State designated farmland depicted on **Figure 5.2-1** was overlaid with the proposed General Plan’s land use designations in order to determine the effects the General Plan would have on the designated farmland. This information is depicted on **Figure 5.2-7, Proposed General Plan Land Use Designations Permitting Agricultural Uses With Designated Farmland**. With the project (General Plan) implemented, Prime Farmland, Unique Farmland and Farmland of Statewide Importance are primarily within General Plan designations that allow for continued

agricultural uses. However, in a few locations General Plan and/or Zoning designations are being changed. **Appendix I** of the EIR is the **Designated Farmland Table**. It identifies all parcels within the Planning Area, which currently contain areas of Prime Farmland, Unique Farmland or Farmland of Statewide Importance where there is either a General Plan or Zoning designation change. The Designated Farmland Table in Appendix I show that there are five locations where this occurs. The locations or “sites” (as referenced in the Table) where designated Prime or Unique Farmland, or Farmland of Statewide Importance occurs are portions of Site 3, 5, 8, 15, and all of Site 22. Each site and its respective changes are summarized below. Detailed information can be referenced in Appendix I.

Site 3 – Consists of a total of 66.98 acres within the Sphere Area. The site is designated as Prime Farmland, Farmland of Local Importance and Urban/Built-up Land. The County designates these properties for industrial uses. The City, however, designates them MDR – Medium Density Residential, which is consistent with the existing residential development of the immediate area. Neither of these designations will provide for the retention of Prime Farmland.

Site 5 – Consists of a total of 293.68 acres within the Sphere Area (part of the Alta Cresta Specific Plan). The site is designated as Farmland of Statewide Importance, Farmland of Local Importance, Other Land and Urban/Built-up Land. The County designates these properties as VLDR-Very Low Density Residential, AG-Agriculture, RR-Rural Residential, MDR-Medium Density Residential, MHDR-Medium High Density Residential and VLDR-RC-Very Low Density Residential Rural Community Foundation. The City, however, designates them MDR – Medium Density Residential, LDR-Low Density Residential and VLDR-Very Low Density Residential. Although agriculture is not prohibited under these designations, none of these designations will provide fully for the retention of Farmland of Statewide Importance.

Site 8 – Consists of two parcels, which total 27.85 acres within the Sphere Area. The site is designated as Prime Farmland, Unique Farmland, Farmland of Statewide Importance, and Farmland of Local Importance. The current General Plan designation is RAR-Agricultural and Rural Residential. The City, however, designates the site as C-Commercial. This actually changes a site from a designation, which could have allowed agriculture to a designation, which does not allow agriculture. Therefore, at the programmatic level, Prime Farmland, Unique Farmland, and Farmland of Statewide Importance will be lost.

Site 15 – Consists of a total of 142.83 acres of which 62.44 acres are various types of designated Farmland. The site is designated as Unique Farmland, Farmland of Statewide Importance, Farmland of Local Importance, Other Land, and Urban/Built-up Land. The existing General Plan designation is RLD-Low Density Residential and RES-Estate Residential. The proposed General Plan designations are LDR-Low Density Residential and VLDR-Very Low Density Residential. Although agriculture is not prohibited under these designations, none of these designations will provide fully for the retention of Farmland of Unique Farmland and Farmland of Statewide Importance.

Site 22 – Consists of 9.69 acres within the Orangecrest Specific Plan. The site is designated as Farmland of Statewide Importance and Urban/Built-up Land. The site is currently an

orange grove. The former General Plan Designation was CBO-Retail Business & Office. The proposed General Plan Designation is HDR-High Density Residential. Neither of these designations will provide for the retention of Farmland of Statewide Importance.

Additionally, as shown on **Figure 5.2-4, Proposed Zones Permitting Agricultural Uses**, the zoning will be consistent with the General Plan designations, thus, as described above and in Appendix I some areas will be rezoned to uses which will likely not retain Designated Farmland.

The City of Riverside has identified several policies within its General Plan (see above in Related General Plan Policies), which discourage the premature conversion of agricultural lands, however, none require the protection of designated Farmland. Because General Plan and Zoning designations are being changed and the new designations do not provide for the preservation of Prime Farmland, Unique Farmland or Farmland of Statewide Importance; and because General Plan policies do not require preservation of designated Farmland, it is considered a **significant impact** related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use.

**Threshold:** *Conflict with a Williamson Act contract or existing zoning for agricultural use.*

#### *General Plan and Zoning Code Revision*

There are two Williamson Act preserve areas within City limits: one parcel within Hunter Business Park along the City border near the northeast part of the City at the intersection of Columbia Avenue and Michigan Avenue, and four parcels south of SR-91 and west of the intersection of Overlook Parkway and Washington Street within the Arlington Heights Greenbelt. Riverside County indicates that there are numerous Williamson Act parcels within the Sphere Area (County of Riverside TLMA Geographic Information System, 2006). The active preserve areas within the City's Sphere of Influence include El Sobrante No. 1, El Sobrante No. 2, El Sobrante No. 3, El Sobrante No. 14, Highgrove No. 1, Woodcrest No. 3, Woodcrest No. 4, Woodcrest No. 5 and Woodcrest No. 7. The status of the lands within County (City Sphere Area) preserve areas include parcels in active agricultural/open space use within the El Sobrante and Highgrove Preserves, parcels that have filed for notices of non-renewal within the Woodcrest Preserves, and parcels that have completed their notice of non-renewal periods, but where a diminishment of the agricultural preserve has not been initiated and/or completed as in the case of the Highgrove and Woodcrest Preserves. Williamson Act preserves in the City and Sphere Areas are shown on **Figure 5.2-2, Williamson Act Preserves**.



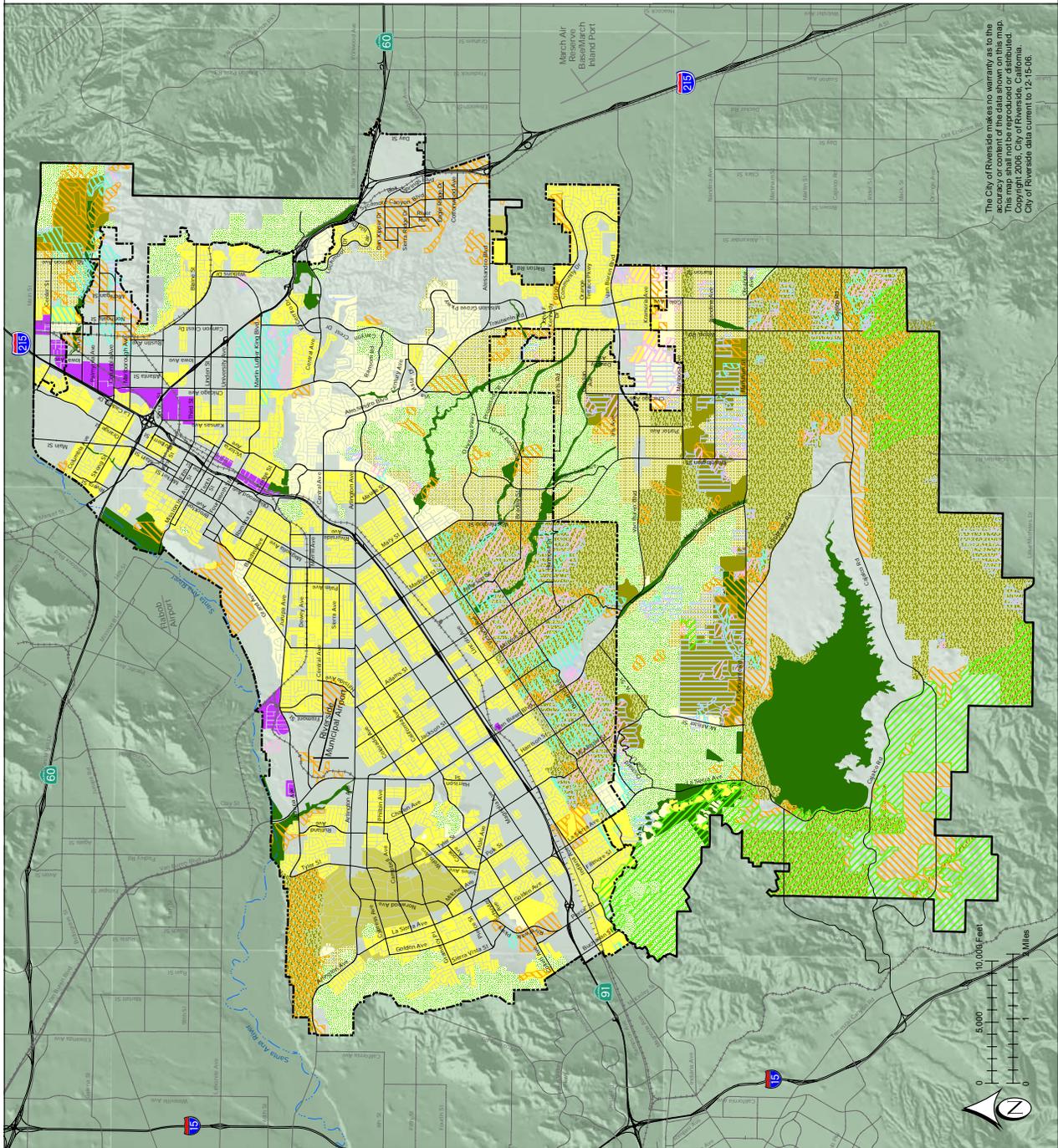
**LEGEND**

**PROPOSED GENERAL PLAN LAND USE**

- A - AGRICULTURAL
- ARR - AGRICULTURAL/RURAL RESIDENTIAL
- HR - HILLSIDE RESIDENTIAL
- SRR - SEMI RURAL RESIDENTIAL
- VLDR - VERY LOW DENSITY RESIDENTIAL
- LDR - LOW DENSITY RESIDENTIAL
- MDR - MEDIUM DENSITY RESIDENTIAL
- I - INDUSTRIAL
- OS - OPEN SPACE/NATURAL RESOURCES
- DESIGNATED FARMLAND
- GRAZING LAND
- FARMLAND OF LOCAL IMPORTANCE
- FARMLAND OF STATEWIDE IMPORTANCE
- PRIME FARMLAND
- UNIQUE FARMLAND
- RIVERSIDE CITY BOUNDARY
- RIVERSIDE PROPOSED SPHERE OF INFLUENCE

SOURCE: CITY OF RIVERSIDE, PROPOSED GENERAL PLAN 2025 AND FARMLAND MAP 2004

**Figure 5.2-7  
PROPOSED GENERAL PLAN  
LAND USE DESIGNATIONS  
PERMITTING AGRICULTURAL USES  
WITH DESIGNATED FARMLAND**



The City of Riverside makes no warranty as to the accuracy, completeness, or reliability of this map, and neither is it intended to constitute an offer of insurance. Copyright 2006, City of Riverside, California. City of Riverside data current to 12-15-06.

Although there are some Williamson Act Contracts in the City, the General Plan and Zoning Code Revision do not propose to cancel those contracts. The General Plan and Zoning lay out only a general blueprint for development, and do not ultimately have the authority to cancel or eliminate those contracts. Additionally, Policy OS-3.8 of the Open Space Element encourages the City to retain Williamson Act Contracts. The contracted parcels located within the Arlington Heights Greenbelt will likely remain in agricultural uses.

However, one of the Williamson Act contract areas shown on **Figure 5.2-2** near the Northern Sphere is not zoned or general plan designated to allow for agricultural uses if the project is implemented. The 13.5-acre parcel is within Hunter Business Park along the City border near the northeast part of the City at the intersection of Columbia Avenue and Michigan Avenue. The parcel has been mapped as containing approximately 3.7 acres of Prime Farmland, approximately 3.6 acres of Farmland of Statewide Importance and approximately 6.2 acres of Unique Farmland. This parcel does not appear on the list in Appendix I because the general plan designation and zoning for this site were not changed from its 1994 designations by the proposed update of the General Plan or amendment to the Zoning Code. The status of the 13.5-acre parcel under Williamson Act Contract is not changed by the proposed Project; therefore no direct impact will result from the implementation Project.

The proposed General Plan and Zoning do not propose to cancel any Williamson Act Contracts, and any future cancellations by property owners as part of future development proposals would have to have their own CEQA analysis. The only non-conforming contracted land within the City limits was non-conforming under the 1994 General Plan, therefore the proposed Project does create any new conflict with the 13.5-acre site under Williamson Act Contract. Review of Figure 5.2-2 and Figure 5.9-6, Conceptual Land Use Plan, shows that the preserve areas located within the Sphere are all located within land use designations where agriculture is allowed. Therefore, **impacts related to Williamson Act contract conflicts are considered less than significant.**

**Figure 5.2-4, Proposed Zones Permitting Agricultural Uses** depicts the areas that would allow agricultural uses under the revised Zoning Code. As shown by comparing **Figure 5.2-3, Existing Zones Permitting Agricultural Uses** and **Figure 5.2-4**, the adoption of the revised Zoning Code for the City of Riverside will retain the majority of its currently zoned areas, which allow for agricultural uses. However, in a few locations Zoning designations are being changed from zones, which allow agriculture to zones, which do not. **Appendix I** of the EIR is the **Designated Farmland Table**. It identifies all parcels within the Planning Area, which have Zoning designations that change such that agriculture is no longer an allowable use. The Designated Farmland Table in **Appendix I** shows that there are fourteen locations where this occurs. The locations or “Sites” (as referenced in the Table) where this occurs are Sites 4, 8 (portion), 9, 10, 11, 12, 13, 14, 15, 16, 17, 18 (portion), 19, 20 (portion), and 21. The total acreage involved in these zoning changes is 535.45 acres. In addition, some Sites also have new General Plan designations, which do not allow agriculture. The sites where General Plan designations will not permit agriculture are Sites 1, 4, 6, 7, 8, 11, 12, 13, 18 (portion), 20 (portion), and 21. The total General Plan designation changes is 612.23 acres. Each site and its respective changes are detailed in **Appendix I**.

Therefore, because both Zoning and General Plan designation are changed by the Project from designations that allow agricultural uses to designations that do not, **potential impacts to existing zoning for agricultural uses are significant.**

***Threshold:** Involve other changes in the existing environment, which could result in conversion of Farmland to non-agricultural use.*

For the purposes of this analysis, Farmland and agricultural land considered under this threshold include Farmland of Local Importance, land subject to Proposition R and Measure C, land under Williamson Act Contract, as well as any other land being used for agricultural uses as non-conforming uses. Both indirect and direct impacts to agricultural land and uses are discussed below.

The implementation of the General Plan will indirectly influence the conversion of farmland by facilitating development, increasing densities as well as the construction of roads and infrastructure in proximity to operating agricultural areas. For instance, development adjacent to agricultural areas could generate dust that could affect agricultural productivity. In the long term, potential effects associated with increased access to adjacent agricultural lands could include vandalism to farm equipment or fencing, and theft of crops. Soil compaction from trespassers can also damage crop potential and spread disease.

Additionally, where residential areas are in proximity to agricultural areas, nuisance complaints against the farming activities may also discourage farming. These effects can result in indirect economic impacts to farming operations. Since the City's Zoning and General Plan designations allow for agriculture to be located in residential areas, and since the majority of the Planning Area is built out, future development can indirectly contribute to increased pressure to convert existing agricultural uses to non-agricultural uses, to convert land under Williamson Act contracts, or to discourage agriculture uses altogether.

To reduce direct, indirect and cumulative impacts on agricultural resources, the General Plan includes policies and tools that will retain, protect and encourage agricultural land use. Most importantly, the General Plan will enforce Proposition R and Measure C, which were established to protect agricultural resources in the City. The policies listed above enable the preservation and protection of agricultural land through assistance programs, development of agricultural zones, transfer of development rights and leases to UCR, and development of suitable buffers around agricultural uses to prevent incompatible land uses adjacent to agricultural uses, and water subsidies.

Although not considered by the State as potentially significant under CEQA, Farmland of Local Importance can be of significance to a local community. Within the Planning Area there are a number of Sites, as identified in **Appendix I**, where General Plan and/or Zoning designations have changed. The locations Farmland of Local Importance occurs are portions of Sites 3, 4, 5, 8, 14, 15, 20, and all of Sites 1, 2, 6, 7, and 18. Sites 3, 5, 8 and 15 are discussed under a prior Threshold. Each of the remaining Sites and its respective changes are summarized below. Detailed information can be referenced in **Appendix I**.

- Site 1 – Consists of a total of 144.76 acres, which was a former sanitary landfill, which has been capped. The site is designated as Farmland of Local Importance and Other Land. The existing Zoning of O-Official is changed to PF-Public Facilities under the Project. The existing General Plan designation changes from NOS-Natural Resources Open Space to PR-Private Recreation. Although the original soils may have been suitable for designation as Farmland, agriculture may not be an appropriate use over a former landfill due to tilling, irrigation, and other cultivation practices.
- Site 2 – Consists of a total of 5.86 acres of property formerly designated General Plan ILT-Light Industrial and MDR-Medium Density Residential. The General Plan designation has been changed to B/OP-Business Office Park, neither of which allowed for agriculture. The zoning on part of the site was modified in designation but with little change in nature of uses. The Site is designated as Farmland of Local Importance, Other Land and Urban/Built-up Land. The land use and zoning designations do not provide for agriculture now or in the future.
- Site 4 – Consists of a total of 195.38 acres within the Sycamore Canyon Business Park Specific Plan (SCBPSP). The site is designated as Farmland of Local Importance, Other Land, and Urban/Built-up Land. The parcels within this Site have the SP – Specific Plan Combining Zone applied to them. Although they were zoned RA-SP they could not be developed as single-family residential properties, which allow agriculture, as the SP Combining Zone applied the requirements of the SCBPSP to the properties. So the change of zone from RA to BMP was required to create consistency.
- Site 6 – Consists of a total of 23.7 acres of which 13.34 acres are proposed to be C-Commercial General Plan designation. This is consistent with the County’s General Plan designation. However, the City’s prior General Plan Designation was RHS-Hillside Residential and AGR-Agriculture so the change will eliminate agriculture as a use. The site is designated as Farmland of Local Importance.
- Site 7 - Consists of 2.13 acres within the County. The site is designated as Farmland of Local Importance and Urban/Built-up Land. The existing General Plan designation is RAR-Agriculture and Rural Residential. The proposed land use designation is C-Commercial. This change will result in the elimination of agriculture as an allowable use.
- Site 14 – Consists of 4.46 acres of property currently owned by the Metropolitan Water District (MWD). The site is designated as Farmland of Local Importance and Urban/Built-up Land. The present zoning of RA-Residential Agriculture will be changed to RE-Residential Estate, which represents no change in allowable uses. The Current General Plan Designation is Public Right of Way and VLDR-Very Low Density Residential is the proposed designation. These designation changes would allow agriculture, however, as MWD needs the land for public infrastructure purposes.
- Site 18 – Consists of 127.79 acres of which 101.42 acres have land use changes. The site is designated as Farmland of Local Importance, Other Land, and Urban/Built-up Land.

Two of these properties comprise the Agriculture Park. The other properties are owned by the State. The land use and zoning changes reflect name changes and consistency issues. This area is retained for agriculture so these changes represent no impact to Farmland of Local Importance.

Site 20 – Consists of a total of 116 acres, which required changes in designation out of 206.61 acres located within the La Sierra University Specific Plan. The site is designated as Farmland of Local Importance, Other Land, and Urban/Built-up Land. The changes from current to proposed Zoning and General Plan designations simply brought the area in to create consistency. Generally, RA-Residential Agriculture zoning was changed to RE-Residential Estate, and Public Facilities General Plan designations were revised to Public Facilities and Institutional Uses. This represents no substantive change in land use.

The 13.5-acre parcel under Williamson Act Contract near the northern Sphere area, does not appear on the list in Appendix I because the general plan designation and zoning for this site were not changed from its 1994 designations by the proposed update of the General Plan or amendment to the Zoning Code. The owner of the subject parcel previously requested a cancellation of the agricultural preserve, but failed to complete the steps necessary for a cancellation or a notice of non-renewal and disestablishment of the preserve. Thus, the development implemented as a result of the proposed Project, especially within the northern Sphere area, will exert indirect pressure for the owner to convert this land to non-agricultural uses.

Although the proposed General Plan and Zoning Code Revision still allows for agricultural uses in the majority of its Planning Area, the indirect influence of existing and proposed development in the City and its Sphere is expected to contribute to direct and indirect conversion of agricultural resources. In addition, some areas designated as Farmland of Local Importance have land use and zoning designation changes which preclude agriculture as a future use. Therefore, **impacts related to the conversion of Farmland of Local Importance, land subject to Proposition R and Measure C, as well as any other land being used for agricultural uses, as non-conforming uses are considered significant.**

## **Proposed Mitigation Measures**

An Environmental Impact Report is required to describe feasible mitigation measures, which could minimize significant adverse impacts (CEQA Guidelines, Section 15126.4). Programmatic mitigation measures were evaluated for their ability to eliminate or reduce the potential significant adverse impacts related to agricultural resources to below the level of significance.

As described above, the Project includes various components designed to address the impacts of the Project on a programmatic level. Objective OS-3 of the Open Space and Conservation Element of the General Plan is to “[p]reserve designated agricultural lands in recognition of their economic, historic, and open space benefits and their importance to the character of the City of Riverside.” The General Plan also includes specific policies to further that objective. For example, Policy OS-3.7 commits the City to “[e]valuate various proactive programs for

agricultural preservation such as transfer of development rights, purchase lease back, University purchase for research and purchase of development rights.” Further, the General Plan’s Implementation Program includes specific tools to be implemented as development occurs within the General Plan area. Tool OS-9, for example, directs the Planning Division to preserve agricultural areas using such methods as negotiations with property owners during the development process, transfer of development rights, and application of Measure C and Proposition R. These mitigation measures are incorporated into the General Plan, as provided in State CEQA Guidelines Section 15126.4(a)(2).

Adherence to the above General Plan policies and tool, as applicable on a project-by-project basis, will reduce impacts to agricultural resources, to the extent feasible; however, even with implementation of the above policies, direct impacts caused by redesignation and rezoning and indirect impacts associated with increased development pressures, remain significant and unavoidable. No feasible mitigation exists that will reduce impacts to below a level of significance at the programmatic level.

The economic viability of agricultural operations in the Riverside Sphere of Influence and southern California has declined in recent years. Increasing prices of land, higher water and labor costs, increased environmental regulations, higher property taxes, competition from other parts of the state, and growing urbanization have all worked together to put considerable pressure on farming as an economically viable use. The City recognizes Farmland as a finite and unique resource. Once the Farmland within the Project is converted to other uses, that farmland is effectively eliminated.

Public Resources Code Section 21002 states “it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.” State CEQA Guidelines Section 15364 defines “feasible” as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.”

The City has considered both on-site and off-site mitigation, such as easements and conservation zones, for the loss of agricultural land and uses but has found such mitigation to be infeasible. Maintaining agricultural uses outside of the RC and RA-5 Zones is not economically viable. Agriculture needs specialized support services such as feed stores, equipment sales and maintenance, and manure removal services. Without a critical mass of customers, such agricultural support services may relocate further away, thereby increasing the costs of such services and decreasing the profitability of agricultural operations. According to the United State Department of Agriculture, National Agriculture Statistics Service, Census of Agriculture, farm production expenses in Riverside County increased from an average of \$204,052 per farm in 1997 to \$253,339 per farm in 2002. Total sales of agricultural goods decreased from \$1,057,307 in 1997 to \$1,008,273 in 2002. Over the same time period, the number of farms in Riverside

County decreased from 3,864 in 1997 to 3,186 in 2002. These trends will continue as the cost of land, supplies, and services increase.

Environmental factors and regulations are also causing the decline in the viability of agriculture. Stricter air quality and water quality regulations are making farming more difficult and are creating an environmental burden on urbanized areas. Declining water supply is another factor contributing to the overall decline of agricultural activity in the State. Studies suggest that such environmental and economic factors contribute more to the conversion of agriculture than urban development.

To mitigate for loss of farmland on a Citywide and cumulative basis, the City considered implementing a program that would establish a fee for the purchase of agricultural replacement land or a program that would establish agricultural easements. A conservation easement is an easement that is purchased from a willing landowner and which places a permanent deed restriction on the use of land. Such a mechanism would appear to reduce significant impacts to agricultural lands in the future by ensuring that certain properties are maintained for agricultural use. Additionally, purchasing property with a deed restriction will not ensure that the property is actually employed for agricultural uses. Nor will the purchase of such lands or the establishment of easements reduce any of the financial pressures associated with farming. As discussed above, economic and environmental factors will preclude the long-term viability of agriculture in Riverside County and the Inland Empire. Agricultural easements on different agricultural land would not (1) avoid the loss of farmland, (2) minimize the scope of the project, (3) repair, rehabilitate or restore the affected farmland, (4) or replace the affected farmland with substitute farmland. Thus, such a program would not actually mitigate the significant impact caused by the Project. (State CEQA Guidelines, § 15370.) Further, funding off-site agricultural preservation outside of the Planning Area lacks the essential nexus to the effects of the Project. While preserving agricultural land in other parts of the state may bestow a benefit on other regions, no such benefit is possible for the area affected by the Project. Therefore, such a program would not be legally feasible. Likewise, mitigation measures involving conservation easements and other methods of agricultural preservation have been considered but rejected as infeasible for this Project.

In addition, while the No Project Alternative would reduce direct impacts to agriculture, reducing the planning area's ability to develop would impede the City from achieving its General Plan goals and objectives for housing and creation of jobs. Mitigation located outside the Planning Area is infeasible because there is no other comparable land planned for new agriculture in the General Plan and would conflict with General Plan goals for housing, biological habitat/open space, and fiscal balance.

Although, City-wide farmland preservation is considered infeasible, it should be noted, that the City's General Plan policies protects agricultural land in the City's RA-5 and RC Zones and encourages the conservation of additional agricultural land while allowing agricultural uses to continue during the transition to urban uses.

## **Summary of Environmental Effects After Mitigation Measures Are Implemented**

Since the General Plan and Zoning Code updates will contribute to conversion of land under Williamson Act Contract indirectly; conversion of agricultural uses to non-agricultural uses through redesignations which do not allow for agricultural uses; and since Prime Farmland, Farmland of Statewide and Local Importance, and Unique Farmland will be designated for other than agricultural uses; these impacts are considered significant. Additionally, the Project's contribution to the overall decline of agriculture in the region is also considered significant. For reasons stated above, there are no feasible mitigation measures, which can reduce these impacts. Therefore, a Statement of Overriding Considerations is necessary prior to project approval.