

4.2 Agricultural Resources

This section describes the level and type of existing agricultural resources in and around campus, including identification of any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and addresses the potential for implementation of the proposed 2021 LRDP to result in the conversion of agricultural lands to other uses.

4.2.1 Environmental Setting

Regional Setting

The citrus industry was the mainstay of the region's economy starting in the late nineteenth century and, as recently as the mid-1950s, large areas of Riverside remained in citrus groves. The late twentieth century saw a significant increase in pressure to convert agricultural land to suburban uses and, as a result, farmland has slowly been replaced by non-agricultural uses in the City of Riverside (City). The only significant block of agriculture remaining in the City limits is the Arlington Heights Greenbelt, in the southern and central portion of the City. Even in this area, many of the citrus groves are being converted to wholesale nurseries. More farmland conversion occurs in the western portion of the County of Riverside, where the City is located, than other areas of the County (City of Riverside 2007).

Campus Setting

UCR's agricultural roots are older than the University itself, when the UC founded the Citrus Research Center and Agricultural Experiment Station (CRC-AES) in 1907. The CRC-AES is managed by the Department of Agricultural Operations, a support department of the College of Natural and Agricultural Sciences. The mission of CRC-AES is to discover and disseminate research-based knowledge to ensure an abundant and nutritious food supply, protection of natural resources, healthy people and communities, and economic and ecological sustainability for the future of California, the nation, and the world. The CRC-AES at UCR is part of the broader UC Division of Agriculture and Natural Resources, whose vision is to address challenges to the State to ensure a high quality of life, a healthy environment, and economic success for future generations.

The Department of Agricultural Operations serves as a point of integration for applied and basic research under field, greenhouse, and screenhouse conditions and offers the opportunity to collaborate across disciplines. CRC-AES hosts research projects addressing issues in agriculture, biotechnology, horticulture, plant pathology, entomology, nematology, food systems, natural resources, environmental sciences, and social sciences. CRC-AES includes the U.S. Department of Agriculture (USDA) Germplasm Repository for Citrus and Dates and active programs involving community participants, research faculty from other UC campuses, county-based UC Cooperative Extension Advisors, as well as collaborations with other institutions outside of California.

The UCR campus contains 21 different fields and many agricultural facilities such as greenhouses, screen and lath house spaces, and services for research projects. West Campus contains a variety of plant species for agricultural research, including different types of citrus, avocado, European olive, and corn (Psomas 2019; Appendix D). UCR also manages the 540-acre Coachella Valley Agricultural Research Station located 90 miles southeast of campus, which was adopted as a mitigation measure for the loss of agricultural land at UCR and would not be affected by the 2021 LRDP.

The UCR campus contains land categorized as Prime Farmland, Farmland of Statewide Importance, Unique Farmland (collectively referred to herein as “Farmland”), and Farmland of Local Importance (as described in Section 4.2.2 below). Most of the categorized Farmland is on West Campus, though a relatively small area is on East Campus near the USDA Salinity Laboratory north of the UCR Botanic Gardens (DOC 2016). The remaining acreage is considered urban and built-up land or other land (on East Campus). Existing farmland categories on the UCR campus are described in Table 4.2-1 and shown in Figure 4.2-1.

Table 4.2-1 UCR Existing Farmland

FMMP Category	East Campus Acreage	West Campus Acreage
Prime Farmland	0	265.9
Farmland of Statewide Importance	10.7	85.6
Farmland of Local Importance	0	17.3
Unique Farmland	1.5	24.4
Urban and Built-Up Land	431.8	63.0
Other Land	159.6	47.6
Total Acreage (Rounded)	604	504

FMMP = Farmland Mapping and Monitoring Program
 Source: DOC 2016

East Campus

East Campus Farmland is primarily Farmland of Statewide Importance (10.7 acres) with some Unique Farmland (1.5 acres) concentrated near the eastern campus boundary at the USDA Salinity Laboratory, a seven-acre research facility run by the USDA Agriculture Research Service’s Agricultural Water Efficiency and Salinity Research Unit (USDA 2019)¹.

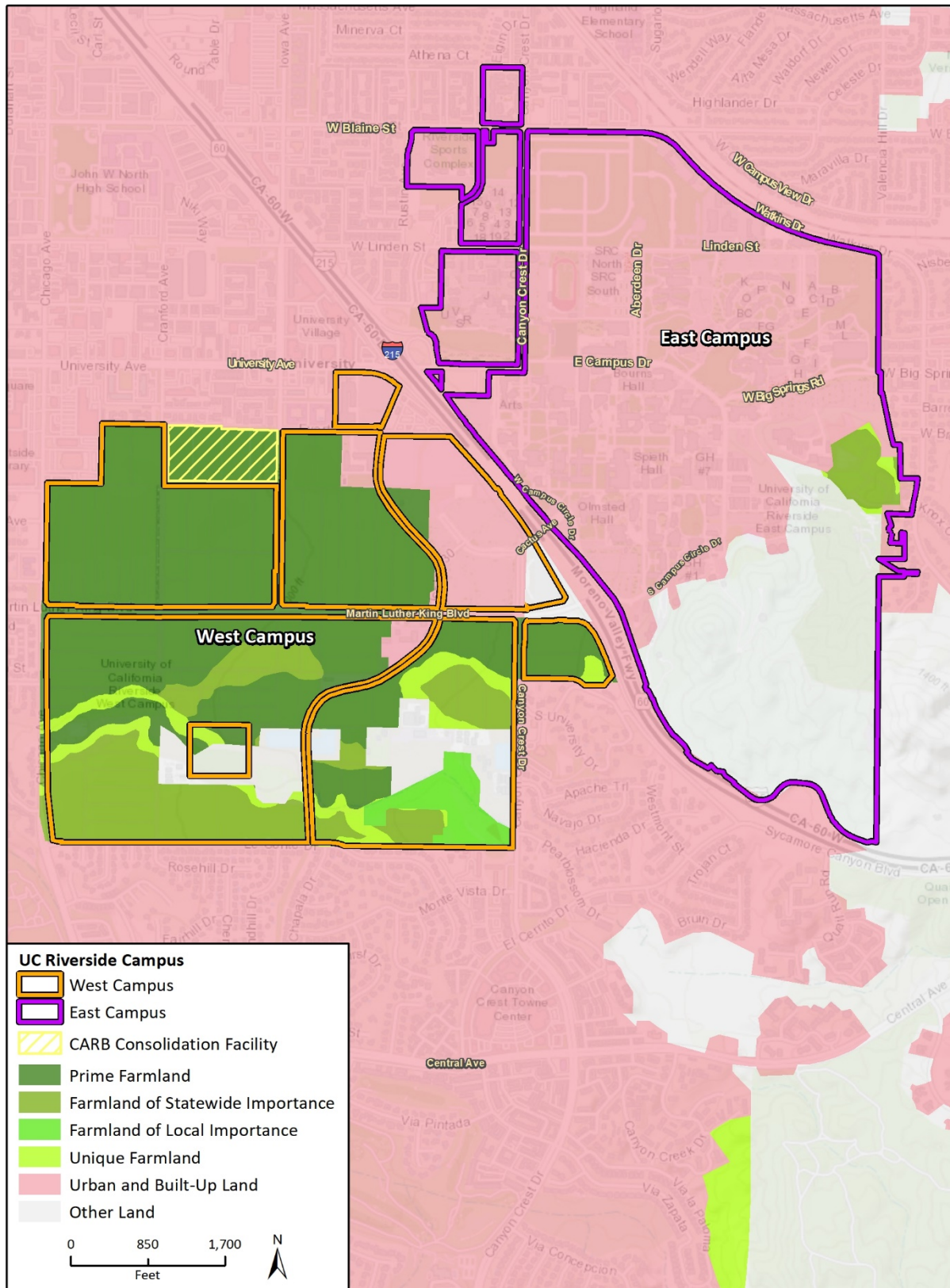
West Campus

Historically, West Campus land has been devoted to agricultural research uses. Nearly 20 percent of the University’s research expenditures occurs in agricultural fields and in the indoor labs which support them (UCR 2020).

West Campus Farmland is primarily Prime Farmland (265.9 acres) concentrated in areas north and south of Martin Luther King Boulevard. Slivers of land categorized as Unique Farmland (24.4 acres) generally follow the Box Springs Arroyo which runs east-west through the lower half of West Campus. South of the Box Springs Arroyo is generally Farmland of Statewide Importance (85.6 acres). There are also areas of Farmland of Statewide Importance and Unique Farmland east of the Gage Canal and north of the agricultural research facilities. Farmland of Local Importance (17.3 acres) is concentrated in the southeastern corner of West Campus south of the Box Springs Arroyo.

¹ The United States Department of Agriculture Salinity Laboratory is on UCR property, on East Campus, and has an existing 50-year ground lease agreement (March 1, 1988 to March 1, 2038).

Figure 4.2-1 UCR Campus Farmland Designations



Data source: California Department of Conservation, 2016
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Fig. 4.2-1 UCR Campus Farmland Designations_Color

4.2.2 Regulatory Setting

Federal

There are no applicable federal regulations regarding the protection of agricultural resources that would be applicable to the proposed 2021 LRDP.

State

California Department of Conservation Farmland Mapping and Monitoring Program

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

DOC FMMP Farmland Classifications are based on a combination of physical and chemical characteristics of the soil and climate that determine the degree of suitability of the land for crop production. The broad definitions of these categories from the FMMP are provided below:

- “Prime Farmland” is irrigated land with the best combination of physical and chemical features able to sustain long term production of agricultural crops. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for production of irrigated crops at some time during the four years prior to the mapping date.
- “Farmland of Statewide Importance” is irrigated land similar to Prime Farmland that has a good combination of physical and chemical characteristics for the production of agricultural crops. This land has minor shortcomings, such as greater slopes or less ability to store soil moisture than Prime Farmland. Land must have been used for production of irrigated crops at some time during the four years prior to the mapping date.
- “Farmland of Local Importance” is land of importance to the local economy, as defined by each county’s local advisory committee and adopted by its Board of Supervisors. Farmland of Local Importance is either currently producing or has the capability of production; but does not meet the criteria of Prime, Statewide or Unique Farmland.
- “Unique Farmland” is land of lesser quality soils that is usually irrigated but may include non-irrigated orchards or vineyards, as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.
- “Urban and Built-Up Land” is occupied by structure with a building density of at least one unit for every 1.5 acres, or approximately six structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures.
- “Other Land” is land not included in any other mapping category. Common examples include low density rural developments, brush, timber, wetland, and riparian areas not suitable for livestock grazing, confined livestock, poultry, or aquaculture facilities, strip mines, borrow pits,

and water bodies smaller than 40 acres. Vacant and non-agricultural land surrounded by urban development and greater than 40 acres is mapped as other land (DOC 2016).

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. The Williamson Act contracts are automatically renewed annually for an additional 1-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.

University of California, Riverside

UCR Riverside Agricultural Mitigation (Coachella Valley Agricultural Research Station)

The 2005 UCR LRDP called for the conversion of approximately 125 acres of Prime Farmland on West Campus into non-agricultural uses. The 2005 LRDP relied upon mitigation measures contained in the earlier 1990 LRDP, which identified the loss of Prime Farmland as a significant impact (Impact 4.1-1). As a result, MM 4.1-1, from the 1990 LRDP EIR, called for the acquisition of off-campus agricultural land to mitigate the loss of agricultural teaching and research land (UCR 1990). Consistent with that mitigation measure, the campus acquired the Coachella Valley Agricultural Research Station (CVARS), a 540-acre facility (UCR 2011). The 2005 LRDP EIR further noted that “the acquisition of the CVARS reduces the programmatic loss of the 125 acres of agricultural land on campus, but it does not offset the net reduction in farmland in the region. As no new farmlands are being created in the vicinity of the campus, no feasible mitigation has been identified to reduce this significant impact.”

Since analysis and approval of the 2005 LRDP, UCR has only converted approximately 43 acres² of Farmland in the West Campus (which is less than the 125 acres assumed to be converted in the 2005 LRDP).

Regional and Local (Non-Binding)

As noted in Section 4, “University of California Autonomy,” UCR, a constitutionally-created State entity, is not subject to municipal regulations of surrounding local governments for uses on property owned or controlled by UCR that are in furtherance of the University’s educational purposes. However, UCR may consider, for coordination purposes, aspects of local plans and policies of the

² The approximate 43-acre total development and conversion of Farmland on West Campus since the 2005 LRDP efforts include the Solar Farm, the hammer throw area, and the CARB facility.

communities surrounding the campus when it is appropriate and feasible but not bound by those plans and policies in its planning efforts.

4.2.3 Environmental Impacts and Mitigation Measures

Significance Criteria

UCR utilizes the following 2020 CEQA Guidelines Appendix G significance criteria questions related to Agricultural Resources.

Would the proposed 2021 LRDP:

- a) 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?
- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?
- d) Result in the loss of forest land or conversion of forest land to non-forest use?
- e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Issues Not Evaluated Further

Williamson Act Contracts (Criterion b)

The Initial Study for the proposed 2021 LRDP (Appendix A) concluded that the UCR campus does not contain land under current Williamson Act contracts. Therefore, no impacts would occur to designated Williamson Act lands. Potential conflicts with Williamson Act contracts are not evaluated further.

Forestry Resources and Timberland (Criteria c, d, and portion of e)

The Initial Study for the proposed 2021 LRDP (Appendix A) concluded that the UCR campus does not contain lands designated as forest or timber-production lands, therefore, no forestry resources that could be affected by implementation of the 2021 LRDP. Issues related to forestry resources and timberland are not evaluated further.

Analysis Methodology

To evaluate the potential impacts of the proposed 2021 LRDP on agricultural resources, the type and degree of agricultural resources that would be lost or converted were analyzed in relation to FMMP designations of lands in the LRDP boundary and any policies and programs related to the preservation of agricultural resources.

2021 LRDP Objectives and Policies

There are no objectives or policies in the proposed 2021 LRDP related to agricultural resources.

Impact Analysis

Impact AG-1 CONVERT LANDS DESIGNATED AS IMPORTANT FARMLANDS TO NON-AGRICULTURAL USE.

IMPLEMENTATION OF THE PROPOSED 2021 LRDP WOULD RESULT IN THE CONVERSION OF PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE (FARMLAND) TO NON-AGRICULTURAL USE. NO MITIGATION IS SUFFICIENT TO SUBSTANTIALLY REDUCE IMPACT. THEREFORE, IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Construction (On-Campus)

The 1990 LRDP identified and recognized the need to convert Prime Farmland to non-agricultural land uses to accommodate future campus growth. To combat future loss of the Prime Farmland, UCR acquired 540 acres in Coachella Valley, approximately 80 miles east of the main campus, in 1994 and established the CVARS. CVARS is currently operational and supporting UCR's agricultural research mission, focusing on researching agriculture in desert regions (UCR 2005).

The 2005 LRDP proposed development on West Campus of approximately 125 acres of academic, support, housing, parking, and recreational uses north of Martin Luther King Boulevard. The 2005 LRDP EIR concluded that while the acquisition of agricultural land in the Coachella Valley in the 1990s reduced the programmatic loss of the approximate 125 acres of agricultural land at the main campus, it did not offset the net reduction in farmland in the region as no new farmlands were being created in the vicinity of the campus. Therefore, the 2005 LRDP EIR found impacts to Prime Farmland to be significant and unavoidable (UCR 2005). Notably, development processed under the 2005 LRDP has not converted all assumed 125 acres to non-agricultural uses, and most of the land north of Martin Luther King Boulevard is still used primarily for agricultural research (UCR 2005). Since analysis and approval of the 2005 LRDP, UCR has only converted approximately 43 acres³ of Farmland in the West Campus (which is less than the 125 acres assumed to be converted).

In 2011, the 2005 LRDP was amended (2005 LRDP Amendment 2) to allow for the development of the School of Medicine on West Campus. Congruent with the 2005 LRDP EIR, the 2005 LRDP Amendment 2 EIR found the acquisition and establishment of agricultural land in the Coachella Valley did not offset the net reduction in farmland in the region as no new farmlands were being created in the vicinity of the campus. Therefore, the 2005 LRDP Amendment 2 EIR found impacts to Prime Farmland to be significant and unavoidable (UCR 2011). Subsequent to the 2005 LRDP, as amended, the School of Medicine facilities were ultimately developed on East Campus and a future School of Medicine Building 2 is proposed on East Campus and thus, no impacts to Farmland on West Campus would occur as a result of the construction of School of Medicine facilities.

Under the proposed 2021 LRDP, most land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is located on West Campus in areas designated as Agricultural/Campus Research or Land-based Research.

Agricultural/Campus Research designated lands would comprise approximately 19.4 acres in two areas in the northern portion of West Campus flanking the east and west sides of the site of the CARB Southern California headquarters. The land planning vision for the LRDP explains that These Agricultural/Campus Research designations are proposed to be developed in a manner that facilitates interdisciplinary research endeavors, including agricultural/land-based research. Land-

³ The approximate 43-acre total development and conversion of Farmland on West Campus since the 2005 LRDP efforts include the Solar Farm, the hammer throw area, and the new CARB facility.

based Research designations would comprise approximately 419.3 acres on West Campus currently used for agriculture research purposes, mainly south of the designated Agricultural/Campus Research lands south to the border of West Campus at Le Conte Drive (see Figure 2-1).

The Agricultural/Campus Research land use area would provide space to enhance and expand external engagement of UCR's research, education, and public service mission. Agricultural/Campus Research land uses would support the shared UCR and City's aspirations to make and showcase UCR as a center for innovation in agricultural sciences and technology. Agricultural/Campus Research facilities may include space for interdisciplinary research and education, support of land-based research activities, external research partnerships, and public-private innovation partnerships. Secondary permissible uses include parking, open space, utility infrastructure, and other support uses. Development of these facilities on the Agricultural/Campus Research designations would result in the loss of 19.4 acres of Farmland.

Land-based Research land uses may include agricultural field research, instructional and research laboratories, greenhouses, and uses supporting agricultural research. Secondary permissible uses include parking, storage, utility infrastructure, and related support services and facilities. Where these potential secondary uses and associated acreage may be developed are unknown at this time. While some lands currently used for agricultural research would be removed from agricultural production to accommodate these secondary uses, such facilities would support agriculture use and associated research. Given the ancillary nature of these uses, the loss of agricultural land would be less than the acreage assumed to be lost and mitigated in the prior LRDP EIRs, but would still convert acreage in comparison to baseline conditions. Development of the Campus Support designation would also result in the conversion of the triangular parcel of Farmland located east of the Gage Canal between the two solar farms. This triangular parcel measures approximately 4.3 acres.

On East Campus, the USDA Salinity Laboratory and surrounding land is categorized as Farmland of Statewide Importance (10.7 acres) and Unique Farmland (1.5 acres). The underlying land use designation for this area would be Academics & Research under the proposed 2021 LRDP. Academics & Research facilities may include classrooms, instructional and research laboratories and greenhouses; undergraduate, graduate, and professional schools and associated programs; libraries; advanced scientific research facilities; federal research partnerships; performance and cultural facilities; clinical facilities; and ancillary support facilities, such as general administrative offices, conference rooms, and meeting spaces. However, the USDA Salinity Laboratory has a 50-year lease agreement with UCR that expires March 2038; therefore, it is not anticipated that this area would be converted to non-agricultural use during the life of the proposed 2021 LRDP.

The proposed 2021 LRDP reinforces the commitment to the densification of the existing Academic Center and existing urban environment on East Campus, limiting sprawl into existing open space and agricultural and land-based research areas on West Campus.

Agricultural and land-based research is expected to continue to be a major component of UCR's research portfolio over the lifetime of the proposed 2021 LRDP. The proposed 2021 LRDP would impact fewer acres of Farmland than previous UCR LRDPs. However, implementation of the proposed 2021 LRDP would still reduce land available for agricultural research on Farmland in comparison to existing conditions. Consistent with past LRDP EIRs, the establishment of the CVARS as mitigation for impacts to Farmland does not fully offset the net reduction in farmland in the region as no new farmlands were being created in the vicinity of the campus. Therefore, impacts would be **significant and unavoidable**.

Construction (Off-Campus)

The City has identified the Arlington Heights Greenbelt and the Arlanza-La Sierra Lands as important agricultural lands for protection through the City's Measures R and C (approved in 1979 and 1987, respectively). However, the UCR campus is not located adjacent to either of these areas. Land uses surrounding the UCR campus include developed, urban areas and roadways, and are not used for agriculture. The UCR campus is zoned Public Facilities/Institutional by the City and is not considered an area of important agricultural preservation. Furthermore, the majority of UCR's agricultural lands on West and East Campus would continue to be used for agriculture-based research and teaching purposes.

Construction of facilities developed under the proposed 2021 LRDP would not result in the conversion of adjacent or nearby off-campus Farmland and would not impact agricultural uses in the City. Therefore, off-campus impacts related to the conversion of agricultural to non-agricultural uses would be **less than significant**, and no mitigation is required.

Operation (On-Campus)

Impacts related to conversion of Farmland to non-agricultural use on-campus are limited to initial construction impacts. **No on-campus operation impacts** would occur.

Operation (Off-Campus)

Impacts related to operation of new facilities on East and West Campus would not impact off-campus areas designated for agricultural preservation. **No off-campus operation impacts** would occur.

Mitigation Measures

As previously noted, the 1990 LRDP identified and recognized the need to convert Prime Farmland to non-agricultural land uses to accommodate future campus growth. To combat future loss of the Prime Farmland, UCR acquired 540 acres in Coachella Valley, approximately 80 miles east of the main campus, in 1994 and established the CVARS. CVARS is currently operational and supporting UCR's agricultural research mission, focusing on researching agriculture in desert regions (UCR 2005).

The 2005 LRDP proposed development on West Campus of approximately 125 acres of academic, support, housing, parking, and recreational uses north of Martin Luther King Boulevard. The 2005 LRDP EIR concluded that while the acquisition of agricultural land in the Coachella Valley in the 1990s reduced the programmatic loss of the approximate 125 acres of agricultural land at the main campus, it did not offset the net reduction in farmland in the region as no new farmlands were being created in the vicinity of the campus. Therefore, the 2005 LRDP EIR found impacts to Prime Farmland to be significant and unavoidable (UCR 2005). Notably, development processed under the 2005 LRDP has not converted all assumed 125 acres to non-agricultural uses, and most of the land north of Martin Luther King Boulevard is still used primarily for agricultural research (UCR 2005). Since analysis and approval of the 2005 LRDP, UCR has only converted approximately 43 acres of Farmland in the West Campus (which is less than the 125 acres assumed to be converted).

Significance After Mitigation

The establishment of the CVARS as mitigation for impacts to Farmland does not fully offset the net reduction in farmland in the region as no new farmlands were being created in the vicinity of the campus. As such, impacts would be **significant and unavoidable**.

4.2.4 Cumulative Impacts

The cumulative setting for agricultural resources includes the geographic area of Riverside County and San Bernardino County. These two counties were selected because the UCR campus is in Riverside County, but in the western area of Riverside County in proximity to San Bernardino County. Additionally, agriculture is a regional resource common to both counties.

Most land surrounding the UCR campus is suburban use and not designated Farmland. Substantial farmland conversion has already occurred in the western portion of the County of Riverside where UCR is located (City of Riverside 2007). According to the FMMP 2006-2008 mapping cycle report, approximately 19,400 acres of irrigated farmland was removed from agriculture use in Riverside County (including cities) (County of Riverside 2015). Meanwhile, during the same reporting period, Riverside County gained just over 15,100 acres of urban land, well above the biennial average gain of 12,400 acres between the years 1984 and 2006. Homes, golf courses, commercial and community facilities constituted much of the new urban uses. Land idling continues to be common in Riverside County. Nearly 5,500 acres were removed from irrigated agricultural categories to grazing uses during 2005-2006. The State pinpointed the lack of water availability and agricultural market conditions as driving the trend towards agricultural lands being fallowed⁴ (County of Riverside 2015). From 2008 to 2010, nearly another 17,000 acres of farmland was converted to another type of land use in Riverside County (DOC 2014).

There were approximately 19,821 acres of mapped important Farmland in neighboring San Bernardino County in 2016, mostly in the Valley Region (mainly in the cities and unincorporated areas around Chino, Chino Hills, Ontario, Redlands, and Yucaipa) and the North Desert Region (east along Highway 40 and SR-66). About 57 percent of the total was Prime Farmland, and most of the remainder was Farmland of Statewide Importance (County of San Bernardino 2019). From 1984 to 2004, San Bernardino County experienced a loss of 82,961 acres of agricultural lands, with an average of 7,651 acres per year since 2000 (City of Chino 2008). According to the Final EIR prepared for the San Bernardino County General Plan, growth envisioned in the County's General Plan would result in conversion of additional Farmland to urban uses (County of San Bernardino 2007).

Lands converted from agricultural use to non-agricultural use typically do not return to agricultural use later but become part of a more urban condition. Therefore, the removal of such agricultural land would be considered cumulatively considerable in the context of agricultural lands in Riverside County and San Bernardino County. UCR is not accountable for designated agricultural uses and Farmland outside of the campus jurisdiction. The preservation of designated farmland is the responsibility of the public agency in which the land is located. General Plans for the City of Riverside and the Counties of Riverside and San Bernardino contain policies that encourage preservation of lands designated for agricultural uses and those that may be listed as Farmland under the FMMP. However, growth anticipated in the General Plans would result in unavoidable conversion of Farmland. Due to the historic decline in available Farmland in the region and the projected continued conversion of Farmland because of growth and urbanization of the area

⁴ Fallowing is typically seen in agricultural areas as an "interim" use in the transition of an area from active agricultural production to eventual urban, non-agricultural uses

envisioned in applicable General Plans, cumulative impacts on agricultural resources would be **significant and unavoidable**.

While the proposed 2021 LRDP would limit the potential further reduction of available Farmland in the region to the extent feasible, it would not fully prevent further reduction in available Farmland. As described above in Impact AG-1, the 2021 LRDP would result in significant and unavoidable impacts on agricultural resources. The establishment of the CVARS as mitigation for impacts to Farmland does not fully offset the net reduction in farmland in the region as no new farmlands were being created in the vicinity of the UCR campus. Accordingly, the significant and unavoidable impacts of the 2021 LRDP would be **cumulatively considerable**.

4.2.5 References

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