3.2 - Agricultural Resources and Forestry Resources

3.2.1 - Introduction

This section describes existing conditions related to agricultural resources and forestry resources as well as regulatory framework. Information included in this section is based on information from the City of Antioch General Plan, the California Department of Conservation, and the City of Antioch Code of Ordinances. One public comment was received during the Environmental Impact Report (EIR) scoping period related to Agricultural Resources and Forestry Resources.

- Questions why agricultural resources was omitted from the list of probable environmental effects in the NOP given the history of the property.

3.2.2 - Environmental Setting

Farmland Classifications

The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) uses two systems to determine a soil's agricultural productivity: The Land Capability Classification System and the Storie Index Rating System. The "prime" soil classification of both systems indicates the presence of few to no soil limitations, which, if present, would require the application of management techniques (e.g., drainage, leveling, special fertilizing practices) to enhance production. The Farmland Mapping and Monitoring Program (FMMP), part of the Division of Land Resource Protection, California Department of Conservation, uses the information from the NRCS to create maps illustrating the types of farmland in the area.

Land Capability Classification System

The Land Capability Classification System takes into consideration soil limitations, the risk of damage when soils are used, and the way in which soils respond to treatment. Capability classes range from Class I soils, which have few limitations for agriculture, to Class VIII soils, which are unsuitable for agriculture. Generally, as the rating of the capability classification system increases, yields and profits are more difficult to obtain. A general description of soil classification as defined by the NRCS is provided in Table 3.2-1 below.

Table 3.2-1: Land Capability Classification

Class	Definition
I	Soils have slight limitations that restrict their use.
II	Soils have moderate limitations that restrict the choice of plants or that require moderate conservation practices.
III	Soils have severe limitations that restrict the choice of plants or that require special conservation practices, or both.
IV	Soils have very severe limitations that restrict the choice of plants or that require very careful management, or both.

Table 3.2-1 (cont.): Land Capability Classification

Class	Definition
V	Soils are not likely to erode but have other limitations; impractical to remove, which limits their use largely to pasture or range, woodland, or wildlife habitat.
VI	Soils have severe limitations that make them generally unsuited to cultivation and limit their use largely to pasture or range, woodland, or wildlife habitat.
VII	Soils have very severe limitations that make them unsuited to cultivation and that restrict their use largely to pasture or range, woodland, or wildlife habitat.
VIII	Soils and landforms have limitations that preclude their use for commercial plants and restrict their use to recreation, wildlife habitat, or water supply or to aesthetic purposes.

Note:
Capability subclasses are soil groups within one class. They are designated by adding a small letter, e, w, s, or c, to the class numeral, for example, IIe. The letter e shows that the main hazard is the risk of erosion unless close-growing plant cover is maintained; w shows that water in or on the soil interferes with plant growth or cultivation (in some soils the wetness can be partly corrected by artificial drainage); s shows that the soil is limited mainly because it is shallow, droughty, or stony; and c, used in only some parts of the United States, shows that the chief limitation is climate that is very cold or very dry.
Source: USDA NRCS. 1973. Soil Survey of Contra Costa County

Storie Index Rating System

The Storie Index Rating System ranks soil characteristics according to their suitability for agriculture from Grade 1 soils (80 to 100 rating) that have few or no limitations for agricultural production, to Grade 6 soils (less than 10 rating) that are not suitable for agriculture. Under the Storie Index Rating System, soils deemed less than prime can function as prime soils when limitations such as poor drainage, slopes, or soil nutrient deficiencies are partially or entirely removed. The six grades, ranges in index rating, and definition of the grades, as defined by the NRCS, are provided below in Table 3.2-2.

Table 3.2-2: Storie Index Rating System

Grade	Index Rating	Definition
1—Excellent	80 through 100	Soils are well suited to intensive use for growing irrigated crops that are climatically suited to the region.
2—Good	60 through 79	Soils are good agricultural soils, although they may not be so desirable as Grade 1 because of moderately coarse, coarse, or gravelly surface soil texture; somewhat less permeable subsoil; lower plant available water holding capacity, fair fertility; less well drained conditions, or slight to moderate flood hazards, all acting separately or in combination.
3—Fair	40 through 59	Soils are only fairly well suited to general agriculture use and are limited in their use because of moderate slopes; moderate soils depths; less permeable subsoil; fine, moderately fine or gravelly surface soil textures; poor drainage; moderate flood hazards; or fair to poor fertility levels, all acting alone or in combination.

Table 3.2-2 (cont.): Storie Index Rating System

Grade	Index Rating	Definition
4—Poor	20 through 39	Soils are poorly suited. They are severely limited in their agricultural potential because of shallow soil depths; less permeable subsoil; steeper slope; or more clayey or gravelly surface soil texture than Grade 3 soils, as well as poor drainage; greater flood hazards; hummocky micro-relief; salinity; or poor fertility levels, all acting alone or in combination.
5—Very Poor	10 through 19	Soils are very poorly suited for agriculture, are seldom cultivated and are more commonly used for range, pasture, or woodland.
6—Non-Agriculture	Less and 10	Soils are not suited for agriculture at all due to very severe to extreme physical limitations, or because of urbanization.
Source: USDA NRCS. 1973. Soil Survey of Contra Costa County.		

Farmland Mapping and Monitoring Program

City of Antioch

The City of Antioch General Plan does not specifically outline agricultural resources within the City. According to the Contra Costa County Department of Conservation and Development, there is no agricultural land within the City of Antioch.[1]

Project Site

The project site is located within the Sand Creek Focus Area west of Deer Valley Road in the southernmost portion of the City. The site consists of approximately 551.50 acres of undeveloped land. The entire Sand Creek Focus Area, including the project site, as well as the undeveloped land to the south and west of the site, has been planned for future urbanization since the 1988 Antioch General Plan. The Department of Conservation designates the project site as Farmland of Local Importance, as shown in Exhibit 3.2-1.[2] Review of topographic maps indicate that the site has been used for cattle grazing since approximately 1968.[3]

Soil Classifications

City of Antioch

As mentioned in Section 3.6, Geology and Soils, the USDA Soil Conservation Service characterizes soils in Contra Costa County as corresponding to those of Lowland and Upland Areas. Specifically, the City of Antioch is comprised of the Capay-Rincon soil association, which consists of nearly level to strong sloping, moderately well drained, and well drained clays and clay loams on valley fill.[4]

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1 Contra Costa County Department of Conservation and Development. 2016. Agricultural Preserves Map Contra Costa County, California. Website: https://www.contracosta.ca.gov/DocumentCenter/View/882/Map-of-Properties-Under-Contract?bidId=. Accessed October 18, 2019.

2 California Department of Conservation. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/dlrp/ciff/. Accessed October 21, 2019.

3 ENGEO, Inc. 2006. Modified Phase One Environmental Site Assessment. Sand Creek Ranch Active Adult Community. July.

4 United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS). General Soil Map of Contra Costa

Project Site

As stated in Section 3. 9, Hydrology and Water Quality, project site soils are classified as Hydrologic Soil Groups (HSG) 'C' and 'A' under the NRCS HSG system. The majority of the project site is classified as HSG 'C' soils, which are composed of Capay clay (CaA), Rincon clay loam (RbA), Altamont clay (AbE), and Altamont-Fontana complex (AcF). These HSG 'C' soils have a low soil permeability and have a very low potential for water to infiltrate the soil. There is a small section of HSG 'A' soils located in the southwest corner of the southern section of the site consisting of Briones loamy sand (BdE), but this area comprises only 1.5 percent of the project site and would not be developed.[5] Table 3.2-3 and Exhibit 3.2-2 show the soils within the project site.

Table 3.2-3: On-Site Land Capability Classification and Storie Index Rating

Soil Name and Map Symbol	Land Capability Classification	Storie Index	Grade
Altamont clay (AbD)	IIIe-5(15)	38	4
Altamont clay (AbE)	IIIe-5(15)	33	4
Altamont-Fontana complex (AcF)	IVe-5(15)	24	4
Briones loamy sand (BdE)	Ve-1(15)	41	3
Capay clay (CaA)	IIs-5(17)	45	3
Clear Lake clay (Cc)	IIs-5(17)	25	4
Rincon clay loam (RbA)	IIs-3(17)	90	1

Note:
Capability subclasses are soil groups within one class. They are designated by adding a small letter, e, w, s, or c, to the class numeral, for example, IIe. The letter e shows that the main hazard is the risk of erosion unless close-growing plant cover is maintained; w shows that water in or on the soil interferes with plant growth or cultivation (in some soils the wetness can be partly corrected by artificial drainage); s shows that the soil is limited mainly because it is shallow, droughty, or stony; and c, used in only some parts of the United States, shows that the chief limitation is climate that is very cold or very dry.
Source: USDA Soil Conservation Service. 1977. Soil Survey of Contra Costa County.

Soil Descriptions

The six soil types found on-site are discussed in detail below.

- Altamont clay, 9 to 15 percent slopes (AbD) is located on smooth, rolling hills. Permeability of the Altamont clay is slow. Surface runoff is slow to medium where the soil is tilled and exposed. The hazard of erosion is slight to moderate and slight in areas of range. The available water capacity is 6.5 to 10 inches, and the effective rooting depth is 40 to 60 inches. The soil is used principally for range, dryland grain, and some volunteer hay. The land capability unit is IIIe-5(15); Clayey range site.

County, California. Website: https://www.nrcs.usda.gov/Internet/FSE_MANUSCRIPTS/california/CA013/0/maps/gsm.pdf. Accessed May 13, 2019.

[5] Carson, Barbee & Gibson, Inc. 2019. Preliminary Stormwater Control Plan, page 7.

- Altamont clay, 15 to 30 percent slopes (AbE) is located on rolling hills. Permeability of the Altamont clay is slow. Surface runoff is slow to medium where the soil is tilled and exposed. The hazard of erosion is slight to moderate and slight in areas of range. The available water capacity is 6.5 to 10 inches, and the effective rooting depth is 40 to 60 inches. The soil is used mainly for range, dryland grain, and some volunteer hay. The land capability unit is IIIe-5(15); Clayey range site.
- Altamont-Fontana complex, 30 to 50 percent slopes (AcF) is located on foothills in the eastern upland of Contra Costa County. Permeability of Altamont-Fontana complex is slow. When the soils are bare, surface runoff is medium to rapid and the erosion hazard is moderate to high. The available water capacity is 6.5 to 10 inches, and the effective rooting depth is 40 to 60 inches. This soil is used principally for range and dryland grain or grain hay. The land capability unit is IVe-5(15); Clayey range site.
- Briones loamy sand, 5 to 30 percent slopes (BdE) is located on uplands. Permeability of Briones loamy sand is rapid. Surface runoff is medium to rapid, and the hazard of erosion is moderate to high where the soil s tilled and exposed. The available water capacity is 1.5 to 4 inches, and the effective rooting depth is 20 to 40 inches. The soil is used mainly for range, and new areas are used for home sites. The land capability unit is Ve-1(15); Sandy range site.
- Capay clay, 0 to 2 percent slopes (CaA) is located in basins or on low benches. Permeability of Capay clay is slow. Surface runoff is very slow, and the erosion hazard is none where the soil is tilled and exposed. The available water capacity is 8.5 to 10 inches, and the effective rooting depth is more than 60 inches. The soil is used mainly for irrigated sugar beets, tomatoes, head lettuce, almonds, walnuts, apricots, and barley. The land capability unit is IIs-5(17).
- Rincon clay loam, 0 to 2 percent slopes (RbA) is formed in alluvial valley fill from sedimentary rocks. Permeability to this Rincon clay loam is slow. Surface runoff is slow, and the erosion hazard is none to slight where the soil is tilled and exposed. The available water capacity is 9 to 10 inches, and the effective rooting depth is more than 60 inches. The soil is used principally for irrigated nut crops, fruit, row crops, and forage crops. The land capability unit is IIs-3(17).

Forest Land and Timberland

According to Public Resources Code Section 12220(g), “forest land” is land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. The site is not zoned forest land pursuant to Public Resources Code Section 12220(g), and forest land does not exist on-site. In addition, the site is not zoned for forest land (as defined by Public Resources Code [PRC] § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104[g]).

3.2.3 - Regulatory Framework

Federal

There are no federal regulations related to agricultural resources and forestry resources.

State

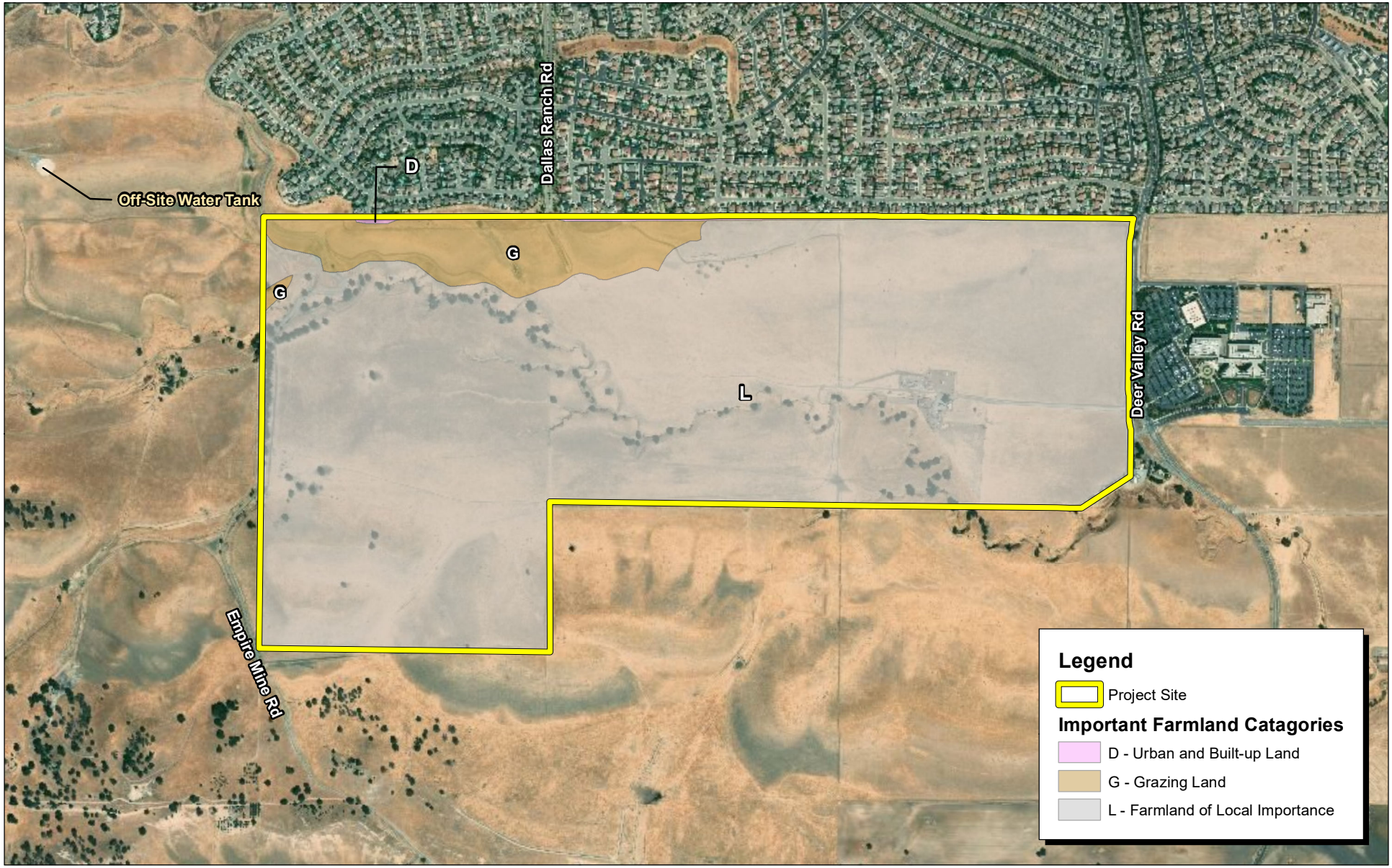
Farmland Mapping and Monitoring Program

The California Department of Conservation established the FMMP in 1982. The FMMP is a non-regulatory program and provides a consistent and impartial analysis of agricultural land use and land use changes throughout California. The FMMP produces maps and statistical data used for analyzing impacts on California's agricultural resources. For environmental review purposes under the California Environmental Quality Act (CEQA), "agricultural land" means Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, as defined by the USDA land inventory and monitoring criteria, as modified for California (PRC § 21060.1). The remaining categories are used for reporting changes in land use as required for the FMMP biennial farmland conversion report. These categories are described below.

- **Prime Farmland:** Prime farmland has the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- **Unique Farmland:** Unique farmland consists of lesser quality soils used for the production of the state's leading agricultural crops. This land 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.
- **Farmland of Statewide Importance:** Farmland of statewide importance is similar to prime farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- **Farmland of Local Importance:** 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 Farmland, Farmland of Statewide Importance, or Unique Farmland. Authority to adopt or to recommend changes to the category of Farmland of Local Importance rests with the Board of Supervisors in each county.

California Land Conservation Act

The California Land Conservation Act, better known as the Williamson Act, was enacted by the State Legislature in 1965 to encourage the preservation of agricultural lands. Under the provisions of the act, landowners agreeing to keep their lands under agricultural production for a minimum of 10 years receive property tax adjustments. Williamson Act contracts limit the use of the properties to agricultural, open space, and other compatible uses. Assessments of Williamson Act lands are based on agricultural value, rather than potential market value under nonagricultural uses.



Source: ESRI Aerial Imagery. County of Contra Costa FMMP GIS Data.

FIRSTCARBON SOLUTIONS™

1,250 625 0 1,250 Feet

Exhibit 3.2-1
Important Farmland Map

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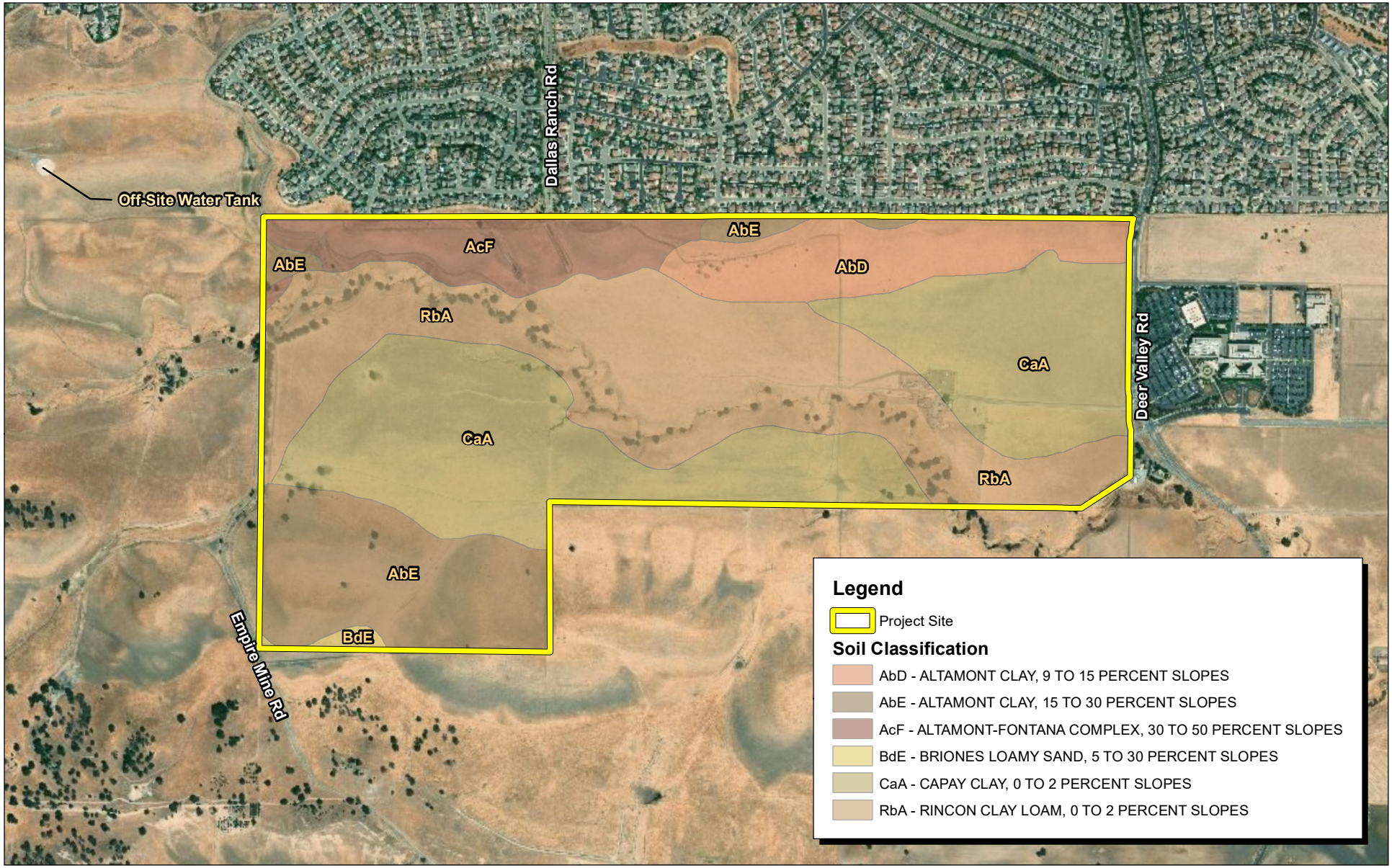

Source: ESRI Aerial Imagery. County of Contra Costa Soils GIS Data.

FIRSTCARBON SOLUTIONS™

1,250 625 0 1,250 Feet

Exhibit 3.2-2
Soils Map

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Local

City of Antioch General Plan

Agricultural uses are included in the "Open Space" land use designation in the Antioch General Plan. The General Plan contains policies intended would help reduce the impacts resulting from conversion of open lands to urban uses. However, none of these expressly addresses agricultural uses, forest land, or timberland.

Antioch Zoning Code

Antioch's zoning code does not contain any districts expressly established for agricultural, forest land, or timberland production.

3.2.4 - Impacts and Mitigation Measures

Significance Criteria

According to CEQA Guidelines Appendix G, to determine whether impacts to agriculture and forestry resources are significant environmental effects, the following questions are analyzed and evaluated. Would the project:

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?

Approach to Analysis

Evaluation of potential impacts of the proposed project on agricultural resources were based on the City of Antioch General Plan; the USDA NRCS Web Soil Survey performed for the project site; the Soil Survey of Contra Costa County; the California Department of Conservation FMMP; and the Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance, Contra Costa County. The standards of significance listed above are used to delineate the significance of any potential impacts.

Impact Evaluation

Convert Farmland to Non-Agricultural Use

Impact AG-1: **The project would not 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.**

Construction/Operation

According to the FMMP, the project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and is not designated or zoned for agricultural use. According to the Department of Conservation, the project site is designated as Farmland of Local Importance. Farmland of Local Importance are lands typically used for livestock grazing, and capable of producing dryland grain on a 2-year summer fallow of longer rotation with volunteer hay and pasture.

While the project site is currently used for grazing and contains some soils that meet the criteria for Prime Farmland and Farmland of Statewide Importance, the site is not used for agricultural production that would contribute to the local economy. Additionally, the site has been designated for future development within the City of Antioch General Plan since 1988. It is also located well-within the urban limit line. As such, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. Impacts would be less than significant.

Level of Significance

Less Than Significant

Conflict with Existing Zoning or Williamson Act Contract

Impact AG-2: **The project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.**

Construction/Operation

As outlined in the City of Antioch General Plan, the project site is designated as Hillside and Estate Residential/Golf Course/Senior Housing/Public-Quasi Public/Open Space. The site is zoned as Study District by the City of Antioch Code of Ordinances. The site is not encumbered by a Williamson Act Contract,[6] and is not zoned for agricultural use. Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

Level of Significance

No Impact

[6] Contra Costa County Department of Conservation and Development. 2016. Agricultural Preserves Map Contra Costa County, California. Website: https://www.contracosta.ca.gov/DocumentCenter/View/882/Map-of-Properties-Under-Contract?bidId=. Accessed October 22, 2019.

Rezoning of Forest Land

Impact AG-3:	**The project would not 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)).**

Construction/Operation

The project site is designated as Hillside and Estate Residential/Golf Course/Senior Housing/Public-Quasi Public/Open Space by the City of Antioch General Plan. The site is zoned as Study District by the City of Antioch Code of Ordinances. The site is not zoned for forest land, timberland, or timberland zoned Timberland Production. As such, the proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. No impact would occur.

Level of Significance

No Impact

Conversion of Forest Land

Impact AG-4:	**The project would not result in the loss of forest land or conversion of forest land to non-forest use.**

Construction/Operation

Section 12220(g) of the California Public Resources Code defines forest land as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. The project site is 551.50 acres and includes a number of native oak trees (approximately 7.00 acres of Valley Oak) mainly lining the Sand Creek corridor, as well as a windrow of non-native Eucalyptus trees (approximately 1.50 acres) along the western property boundary. The native oaks constitute 1.25 percent of the entire project site and only 0.1 percent of them would potentially be impacted by the proposed project (Exhibit 3.4-8). Because the site has well under 10 percent coverage, it is not considered forest land. While these resources are not considered forest land as defined above, the City and project Applicant value these resources.

In this vein, none of the native oak trees within the Sand Creek Corridor will be removed as part of the proposed project. As noted in Section 3.4, Biological Resources, the entire corridor will be preserved and protected in perpetuity—including the trees within it. Similarly, the entire non-native windrow of eucalyptus will remain in place. Finally, there are a few solitary oak trees scattered throughout the project site. None of these oaks are currently slated for removal, although one or two (0.1 percent total) may need to be removed in the future if it is infeasible to design infrastructure around them. See Section 3.4, Biological Resources, for a detailed discussion on trees.

Based on the foregoing, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. No impacts would occur.

Level of Significance

No Impact

Other Changes Resulting in Conversion

Impact AG-5:	**The project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural uses or conversion of forest land to non-forest use?**

Construction/Operation

CEQA Guidelines define Farmland as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. The proposed project would not convert any mapped Prime Farmland, Farmland of Statewide Importance, or Unique Farmland to non-agricultural uses. None of the surrounding sites are farmed or in agriculture production. Beyond the neighboring sites sits the Urban Limit Line (ULL) and Roddy Ranch to the south, and the Empire Mine State Park to the west. The properties to the north and the east of the project site have been fully developed with single-family homes and a hospital, respectively. Thus, the proposed project could not involve other changes that would result in conversions of Farmland to non-agricultural use.

As discussed above, forest land does not exist within the project site, or anywhere adjacent to it. Therefore, the proposed project would not involve changes to the existing environment which, due to their location or nature, could result in the conversion of Farmland to non-agricultural uses or forest land to non-forest uses. No impacts would occur.

Level of Significance

No Impact

3.2.5 - Cumulative Impacts

The geographic scope of the cumulative agricultural and forestry resources analysis is the area immediately surrounding the project site. As previously mentioned, the project site is not designated or mapped as Farmland by the California Department of Conservation.

Convert Farmland to Non-Agricultural Use

The project site is not designated or mapped as Farmland. Therefore, the proposed project would not convert Farmland to non-agricultural use. In addition, the area surrounding the project site is not designated as Farmland. Projects within Table 3-1 are either located within areas designated as Farmland of Local Importance or Urban and Built Up Land—not Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Thus, no agricultural mitigation would be required to mitigate effects related to such lands. Therefore, the proposed project in conjunction with other projects would not convert Farmland to non-agricultural use and cumulative impacts would be less than significant.

Conflict with Existing Zoning or Williamson Act Contract

The project site is not zoned for agricultural use and is not encumbered by a Williamson Act Contract. None of the abutting properties are zoned for agricultural use or encumbered by a

Williamson Act Contract.[7] Therefore, the proposed project in conjunction with other projects would not conflict with existing zoning for agricultural use or Williamson Act contract land. Cumulative impacts would not occur.

Conversion of Forest Land

The project site does not contain any forest land, and is not zoned for forest use. Additionally, cumulative projects listed in Table 3-1 are not zoned for forest use, and are mainly surrounded by existing development. Therefore, the proposed project in conjunction with other projects would not result in the loss of forest land or conversion of forest land to non-forest use. Cumulative impacts would not occur.

Other Changes Resulting in Conversion

As discussed above, the project site is not Farmland and does not contain forest land. Similarly, the cumulative projects listed in Table 3-1 are not Farmland and do not contain forest land. Therefore, the proposed project in conjunction with other projects could not and would not result in the conversion of Farmland for non-agricultural uses or forest land to non-forest uses. No cumulative impacts would occur.

Level of Cumulative Significance

No Impact

[7] Contra Costa County Department of Conservation and Development. 2016 Agricultural Preserves Map Contra Costa County, California. Website: https://www.contracosta.ca.gov/DocumentCenter/View/882/Map-of-Properties-Under-Contract?bidId=. Accessed October 22, 2019.

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