

## 4.2 AGRICULTURE AND FORESTRY RESOURCES

### 4.2 AGRICULTURE AND FORESTRY RESOURCES

This chapter presents the environmental setting and impact analysis for agriculture and forestry resources in the vicinity of the Revised Project components and the alternatives.

The Revised Project would not impact forestry resources. The riparian vegetation community Fremont cottonwood forest was observed in the Goose Creek Golf Club along the Revised Project underground alignment (ICF, 2017). The Fremont cottonwood forest vegetation community may meet the definition of Forest Land described under PRC § 12220(g)<sup>1</sup>; however, this vegetation community is part of a golf course drainage feature within the Santa Ana River floodplain and is not managed for forest resources. No other native tree vegetation communities were identified during the biological survey of the Revised Project area that have the potential to support 10-percent native tree cover. Forestry resources are not considered further in the analysis below.

#### 4.2.1 Consideration of Scoping Comments

The public expressed concerns regarding agriculture and forestry resources impacts during public scoping for this Subsequent EIR. Table 4.2-1 summarizes the scoping comments received regarding agriculture and forestry impacts, and identifies how and/or where these comments are addressed.

**Table 4.2-1 Scoping Comments Related to Agriculture and Forestry Impacts**

Summary of Comment	Location Comment is Addressed
The project will cause damage to produce grown near or under the transmission lines.	Damage to crops in the project area resulting from construction and operation of the transmission lines is addressed in Section 3.2.2 of the 2013 RTRP EIR. The Revised Project would impact less than 1 acre of important farmland. Mitigation measures and compensation for loss of agricultural lands are discussed in Section 4.2.6, Impact Agriculture-a, in this Subsequent EIR.

<sup>1</sup> Forest Land as defined in PRC Section 12220(g) includes land which is capable of supporting 10-percent native tree cover of any species 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.

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### 4.2.2 Environmental Setting

The Revised Project components would be located within and adjacent to agricultural resources designated by the State and local jurisdictions.

#### Farmland Mapping and Monitoring Program

The Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency Department of Conservation (DOC) designates land based on its suitability for agricultural use. The DOC operates the FMMP with the objective to provide maps and statistical data to the public, academia, and local, state, and federal governments, to assist informed decision-making regarding California’s farmland. Under the program, land is rated and mapped for agricultural use based on soil quality and irrigation status (California Department of Conservation, 2004). FMMP land designations are defined in Table 4.2-2. Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance (collectively referred to as "important farmland") comprises approximately 9 percent of Riverside County (California Department of Conservation, 2015). Land designated as important farmland in the Revised Project area is shown in Figure 4.2-1 and Figure 4.2-2.

**Table 4.2-2 FMMP Land Designations in Riverside County**

Designation	Definition	Farmland in Riverside County (Acres)
<b>Agricultural Categories</b>		
Prime Farmland	Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. 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 4 years prior to the mapping date.	118,077
Farmland of Statewide Importance	Farmland like 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 4 years prior to the mapping date.	44,002
Unique Farmland	Farmland of lesser quality soils used to produce 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 4 years prior to the mapping date.	32,582
Grazing Land	Land on which the existing vegetation is suited to the grazing of livestock.	110,102

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Designation	Definition	Farmland in Riverside County (Acres)
<b>Non-Agricultural Categories</b>		
Urban and Built-up Land	Land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.	329,871
Other Land	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. Includes vacant and nonagricultural land surrounded by urban development and greater than 40 acres.	1,018,675
Land Committed to Nonagricultural Use	Existing farmland, grazing land, and vacant areas that have a permanent commitment for development.	2,790,810

Sources: (California Department of Conservation, 2015; California Department of Conservation, 2017)

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**Figure 4.2-1 Important Farmland in the Revised Project Area (Map 1 of 2)**



Sources: (Esri, 2017; California Department of Conservation, 2014; County of Riverside, 2015; SCE, 2017; USGS, 2015)

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**Figure 4.2-2 Important Farmland in the Revised Project Area (Map 2 of 2)**



Sources: (Esri, 2017; California Department of Conservation, 2014; County of Riverside, 2015; SCE, 2017; USGS, 2015)

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### Local Designation of Agricultural Lands

The City of Jurupa Valley and City of Riverside designate parcels of land with specific land use and zoning designations that restrict or authorize certain activities, including agricultural activities. Local land use designations in the Revised Project area are addressed in the City of Jurupa Valley Draft 2017 General Plan (City of Jurupa Valley, 2016a) and the Riverside General Plan 2025 (City of Riverside, 2007). Zoning designations in the Revised Project area are addressed in the 2011 City of Jurupa Valley Zoning Map (City of Jurupa Valley, 2011), Riverside General Plan 2025 Zoning Map (City of Riverside, 2007), Riverside County Ordinance No. 348 (County of Riverside, 2017), and Title 19 of the City of Riverside Municipal Code (City of Riverside, 2015). Table 4.2-3 lists land use and zoning designations with agricultural components within 1,000 feet of the Revised Project area. Land use and zoning designations in the Revised Project area are shown in Section 4.9: Land Use and Planning in Figures 4.9-1 through 4.9-4.

### Active Agricultural Operations

Not all of the important farmland in the Revised Project area is currently being used for agricultural purposes. Active agricultural operations (i.e., cultivated land or where known agriculture activities are present) were identified only in the FMMP-designated Prime Farmland roughly bordered by Limonite Avenue to the south, I-15 to the west, Bellegrave Avenue to the north, and Pats Ranch Road to the east. This area includes a 0.3-mile gap in Pats Ranch Road, which begins 0.2 mile south of Bellegrave Avenue. Active agricultural operations occur within this gap and east of the gap to Wineville Avenue. The areas east of the existing Pats Ranch Road have been developed as residential housing and a public park.

**Table 4.2-3 Local Agricultural Land Use and Zoning Designations in the Revised Project Vicinity**

Designation	Description	Project Elements Within 1,000 Feet
<b>City of Jurupa Valley Zoning</b>		
Light Agriculture (A-1)	Land designation for agriculture, including one-family dwellings, water works facilities, nurseries, greenhouses, orchards, field crops, livestock, and sale of agricultural products.	Underground 230-kV Transmission Line
Heavy Agriculture (A-2)	Land designation for agriculture, including one-family dwellings, water works facilities, nurseries, greenhouses, orchards, field crops, livestock, and sale of agricultural products. Allows for kennels, catteries, and a greater number of livestock than Zone A-1.	Overhead 230-kV Transmission Line and Underground 230-kV Transmission Line

Sources: (City of Jurupa Valley, 2011; City of Jurupa Valley, 2016b)

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### 4.2.3 Regulatory Setting

#### Federal and State

No federal laws or regulations pertaining to agricultural resources are applicable to the Revised Project.

#### State

No state laws or regulations pertaining to agricultural resources are applicable to the Revised Project.

#### Local

##### City of Jurupa Valley

###### *2017 Draft General Plan*

The City of Jurupa Valley adopted the 2017 Draft General Plan on August 17, 2017. The Conservation and Open Space Element of the General Plan identify goals and policies pertaining to aesthetics and visual resources. The following policies and goals are relevant to the Revised Project (City of Jurupa Valley, 2017):

Policy COS 4.1            Agricultural Land Conversion. Discourage the conversion of productive agricultural lands to urban uses unless the property owner can demonstrate overarching community-wide benefits or need for conversion.

##### City of Riverside

###### *City of Riverside General Plan 2025*

The City of Riverside prepared the 2025 General Plan, which was adopted in November 2007. The Land Use and Urban Design Element and Open Space and Conservation Element identify objectives and policies that help guide agricultural and farming land uses in the City (City of Riverside, 2007).

The Open Space and Conservation Element includes the following policy applicable to the Revised Project:

Policy OS-3.9            Coordinate programs to preserve agricultural lands with other public, private and non-profit organizations where feasible.

### 4.2.4 Applicant's Environmental Protection Elements

SCE has proposed EPEs to reduce environmental impacts. EPEs that avoid or reduce potentially significant impacts of the Revised Project will be incorporated as part of any CPUC project approval, and SCE will be required to adhere to the EPEs as well as any identified mitigation measures. The EPEs are included in the MMRP for the Revised Project (refer to Chapter 9: Mitigation Monitoring and Reporting Plan of this Subsequent EIR), and the implementation of the EPEs will be monitored and documented in the same manner as mitigation measures. The EPE that is applicable to the agricultural resource analysis is provided in Table 4.2-4.

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**Table 4.2-4 Environmental Protection Elements for Agricultural Resources**

Environmental Protection Element	Requirements
<b>EPE AGR-01: Minimize Impacts to Active Agricultural Operations</b>	Locate Project Activities to Minimize Impacts to Active Agricultural Operations. <ul style="list-style-type: none"> <li>• Transmission structures would be located adjacent to existing electrical infrastructure to consolidate any potential obstructions to the movement of agricultural machinery</li> <li>• Access roads, spur roads, staging areas, and pulling/splicing sites would be located in areas that minimize impacts to agricultural operations</li> <li>• Removal of perennial crops would be minimized</li> </ul>

### 4.2.5 CEQA Significance Criteria

Appendix G of CEQA Guidelines (14 CCR § 15000 *et seq.*) provides guidance on assessing whether a project would have significant impacts on the environment. Changes to the Proposed Project or changes in baseline conditions that were not analyzed in the 2013 RTRP EIR require additional analysis to fully disclose potential impacts of the Revised Project. The CPUC prepared an Initial Study Checklist (refer to Appendix B of this Subsequent EIR) to identify the new potentially significant or increased impacts that may occur as a result of the Revised Project elements, or changes in baseline conditions. The Initial Study Checklist indicated that the Revised Project would not have the potential for new or increased impacts on agriculture and forestry resources. Since the Initial Study Checklist was published, the CPUC has identified a substantial increase in ground disturbance acreage within designated farmland that would result from the Revised Project. The increased disturbance to designated farmland has the potential for new or increased impacts to the significance criterion below. The CEQA significance criterion is lettered below to match the criterion lettering in the 2013 RTRP EIR. Consistent with Appendix G, the Revised Project would have significant impacts on agricultural resources if it would:

- 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 nonagricultural use.

### 4.2.6 Revised Project Impact Analysis

#### Approach to Impact Analysis

This impact analysis considers whether implementation of the Revised Project would result in significant impacts on agricultural resources and focuses on reasonably foreseeable effects of the Revised Project as compared with baseline conditions. The analysis uses significance criteria based on the CEQA Appendix G Guidelines. These criteria may be modified to address project impacts. The potential direct and indirect effects of the Revised Project are addressed below, and the cumulative effects are addressed in Chapter 5: Cumulative Impacts. Refer to the 2013 RTRP EIR for analysis of other elements of the Proposed Project.

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Applicable EPEs are identified and mitigation is defined to avoid or reduce significant impacts on agricultural resources. The significance of the impact is first considered prior to application of EPEs and a significance determination is made. The implementation of EPEs is then considered when determining whether impacts would be significant and thus would require mitigation. Mitigation measures included in the 2013 RTRP EIR, with modifications when appropriate, and/or additional new mitigation measures are identified to reduce significant impacts of the Revised Project.

### Summary of Impacts

Table 4.2-5 presents a summary of the CEQA significance criteria and impacts on agricultural resources that would occur during construction, operation, and maintenance of the Revised Project.

**Table 4.2-5 Summary of Revised Project Impacts on Agricultural Resources**

Significance Criterion	Project Phase	Significance before EPEs	Significance after EPEs and before Mitigation	Significance after Mitigation
<b>Impact Agriculture-a:</b> Would the Revised Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	Construction	Significant	Significant EPE AGR-01	Less than Significant MM AGR-01
	Operation and Maintenance	Significant	Significant	Significant and Unavoidable MM AGR-03

### Impact Discussion

<b>Impact Agriculture-a: Would the Revised Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?</b>	<b>Significance Determination</b>
	<b>Construction: <i>Less than Significant with Mitigation</i></b>
	<b>Operation &amp; Maintenance: <i>Significant and Unavoidable</i></b>

### Construction

The Revised Project includes installation of two riser poles and construction of a portion of the underground transmission line within Prime Farmland and Farmland of Statewide Importance (Figure 4.2-1 and Figure 4.2-2). The Revised Project also includes undergrounding existing distribution lines to accommodate the new overhead 230-kV transmission line within the City and unincorporated County of Riverside, which would impact Farmland of Statewide Importance at Distribution Line Relocation #8. Estimates of anticipated temporary and permanent impacts on Farmlands are quantified in Table 4.2-6.

Although construction of Distribution Line Relocation #8 would impact Farmland of Statewide Importance, the City of Riverside has zoned the land as a Business and Manufacturing Park Zone. Business and Manufacturing Park Zone designates the land for low-intensity and

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**Table 4.2-6 Areas of Impact on Important Farmland <sup>a</sup>**

FMMP Important Farmland Type	Underground 230-kV Transmission Line (Acres)		Distribution Line Relocation #8 (Acres)		Total	
	Temporary	Permanent	Temporary	Permanent <sup>b</sup>	Temporary	Permanent
Prime Farmland	11.6	0.4	0	0	11.6	0.4
Unique Farmland	0.8	0	0	0	0.8	0
Farmland of Statewide Importance	0	0	0.1	0	0.1	0
<b>Total</b>	<b>12.4</b>	<b>0.4</b>	<b>0.1</b>	<b>0.0</b>	<b>12.5</b>	<b>0.4</b>

Notes:

- <sup>a</sup> Disturbance from construction of the Revised Project was estimated assuming a worst-case scenario. Construction would likely result in less temporary and permanent impacts due to overlapping disturbance areas (e.g., access and spur roads, pulling/splicing sites, staging areas).
- <sup>b</sup> Distribution Line Relocation #8 would involve the installation of two vaults. These vaults are unlikely to occur on important farmland, but their exact locations will not be finalized until final engineering. Each vault would have a permanent impact area of 16 square feet. This impact was considered negligible.

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low-impact industrial, office, and related uses and does not provide for agricultural land uses. The City of Riverside's prior zoning designates the land at Distribution Line Relocation #8 for nonagricultural uses. *Impacts on important farmland at Distribution Line Relocation #8 would be less than significant.*

No conflict would occur between agricultural land use and local jurisdiction zoning in the areas surrounding the underground 230-kV alignment. Construction at these locations, however, would convert important farmland to nonagricultural use if the impacted soils were not restored following construction. Conversion to nonagricultural use would be a significant impact. SCE has proposed EPE AGR-01 to minimize the removal of crops and impacts on the movement of agricultural equipment, but the measure does not fully rectify all of the possible impacts of the Revised Project. Mitigation would be required.

MM AGR-01 requires SCE to restore the soil profile of farmland impacted during construction to pre-construction conditions. All farmland impacted by temporary workspace requirements and construction of underground duct banks would be restored. *Temporary impacts on important farmland would be less than significant with mitigation.*

### Operation and Maintenance

The 2013 RTRP EIR accounted for approximately 1.5 acres of permanent impact on important farmland as designated by the DOC FMMP. The Revised Project would impact less than 1 acre of important farmland and would reduce the overall impact of the 230-kV transmission line on designated agricultural lands.

The City of Riverside (2013) concluded that the 1.5-acre loss of farmland would be a significant and unavoidable impact. The City of Riverside cited the Cherry Valley Pass Acres decision (*Cherry Valley Pass Acres & Neighbors v. City of Beaumont* [2010] 190 Cal.App.4th 316, 352-353), which addressed agricultural easements, and the Friends of the Kangaroo Rat decision (*Friends of the Kangaroo Rat v. California Department of Corrections*, August 18, 2003, Fifth Appellate District Number F040956), which found that lead agencies may reject agricultural easements as infeasible mitigation. A more recent case, decided after the release of the 2013 RTRP EIR, has determined that agricultural conservation easements constitute legally-feasible mitigation for the direct loss of farmland (*Masonite Corporation Dist. v. County of Mendocino*, et al. [July 25, 2013, First Dist., Div. 3] 218 Cal.App.4th 230). Furthermore, the DOC recommends the use of mitigation to offset direct impacts on farmland (Department of Conservation, 2017).

The CPUC has defined mitigation to reduce impacts on agriculture consistent with recent court decisions and State of California recommendations for mitigation of loss of farmland. MM AGR-03 requires SCE to compensate for the loss of agricultural lands caused by the Revised Project at a ratio of 1:1. It is generally accepted by the State of California that agricultural conservation easements would mitigate the impact on important farmland; however, in order to remain consistent with the 2013 RTRP EIR, *the impacts of the Revised Project on important farmland would remain significant and unavoidable.*

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### Mitigation Measures: MM AGR-01 and MM AGR-03

Significance after Mitigation: Significant and Unavoidable

#### 4.2.7 Revised Project Mitigation Measures

##### MM AGR-01: Restore Soils (from 2013 RTRP EIR)

Restore soils to pre-project conditions:

- Replace soils in a manner that shall minimize negative impacts on crop productivity by stockpiling surface and subsurface layers separately and returning those layers to their pre-construction locations in the soil profile.
- The top soil layers shall be ripped to restore compacted soils to their original density. Ripping may also be used in areas where vehicle and equipment traffic have compacted the top soil layers.

**Applicable Locations:** All locations of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance impacted by the Proposed Project

**Performance Standards and Timing:**

- **Prior to Construction:** Separately stockpile surface and subsurface soil layers
- **During Construction:** Protect stockpiled soils from erosion
- **Following Construction:** (1) Return stockpiled soil layers to their pre-construction locations in the soil profile, (2) Rip top soil layers

##### MM AGR-03: Compensation of Farmland Impacts

SCE shall compensate for the loss of farmland resulting from the construction of transmission infrastructure and establishment of permanent vegetation clearance areas around transmission structures. In addition, SCE shall participate in a land conservation program to create permanent conservation easements to preserve agricultural land within the City of Jurupa Valley. SCE's participation in the program shall comply with the following guidelines:

- a. SCE shall acquire farmland or pay fees into a conservation program to permanently preserve an appropriate quantity of land to fully mitigate Revised Project impacts. SCE shall permanently preserve agricultural land at a 1:1 ratio in the City of Jurupa Valley for permanent impacts of the Revised Project.
- b. If land conservation is not feasible within the City of Jurupa Valley, SCE shall inform the CPUC and identify comparable land preservation options within the County of Riverside.
- c. SCE shall conduct and submit to the CPUC the results of a pre-construction assessment to establish the land use of all impacted land and shall be responsible for mitigating important farmland within the City of Jurupa Valley that is permanently converted to another use by the project.
- d. SCE shall provide evidence of compensation prior to construction.
- e. Important farmland that has been converted to land uses or land use designations that preclude the agricultural use of the land would not require mitigation.

**Applicable Locations:** All locations of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance permanently impacted by the Revised Project.

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### Performance Standards and Timing:

- **Prior to Construction:** (1) Assess land use of impacted land, (2) acquire farmland or contribute to conservation program at 1:1 ratio, and (3) provide evidence of compensation to CPUC
- **During Construction:** N/A
- **Following Construction:** N/A

### 4.2.8 Alternatives Setting

#### Environmental Setting

The environmental setting for agricultural resources under Alternative 3 would include the same environmental setting described in the 2013 RTRP EIR. Alternative 3 is located within the Proposed Project alignment and the agricultural designations in the Alternative 3 area have not changed since publication of the 2013 RTRP EIR.

#### Regulatory Setting

The regulatory settings for agricultural resources under Alternative 3 would include the federal, State, and Jurupa Valley policies and regulations identified for the revised project. Regulations that pertain to the City or County of Riverside are not applicable because Alternative 3 does not occur in the City or unincorporated County of Riverside.

### 4.2.9 Alternatives Impact Analysis

#### Alternatives Analysis Scope

The following analysis considers only the environmental impacts resulting from construction and operation of each alternative alignment segment. Any specific alternative replaces only a portion of the Revised Project and would require combination with the remaining unaffected segments of the Revised Project to form a complete alternative route through Jurupa Valley. Impacts resulting from construction and operation of the additional Revised Project elements necessary to form a complete alternative route are not considered in this section. A discussion of the environmental impacts resulting from construction and operation of the complete alternative route, comprised of each alternative alignment plus the unaffected Revised Project elements, is provided in Chapter 6: Comparison of Alternatives.

#### Impacts Avoided by the Alternatives

Alternatives 1 through 4 would be constructed predominantly within city streets and would not affect agricultural or forestry resources. Alternative 3 would be constructed in the same alignment as the Revised Project. Consistent with the Revised Project, Alternative 3 would not impact on four CEQA Appendix G significance criteria:

- 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

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- 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

There are no forest lands or Williamson Act contract lands within the Alternative 3 alignment. Alternative 3 would not conflict with agricultural or forest zoning, or it change the existing environment such that existing agricultural land would be converted to non-agricultural uses. Impacts associated with these significance criteria are not discussed further.

### Alternative 3 Environmental Impacts and Mitigation Measures

Alternative 3 involves extending the underground segment of the Revised Project by 0.25 mile along I-15 in the Revised Project alignment. The riser poles would be constructed at the north end of the extended underground segment.

<b>Impact Agriculture-a: Would Alternative 3 convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?</b>	<b>Significance Determination</b>
	<b>Construction: <i>Less than Significant with Mitigation</i></b>
	<b>Operation &amp; Maintenance: <i>Significant and Unavoidable</i></b>

#### Construction

Construction of Alternative 3 would occur within FMMP-designated Prime Farmland between Pats Ranch Road and I-15, north of Limonite Avenue. Construction activities associated with the installation of riser poles, vaults, and the underground duct banks at this location would temporarily convert 5.4 acres of Prime Farmland to nonagricultural use.

SCE proposed EPE AGR-01 to minimize impacts to agricultural operations; however, the EPE does not require restoration of impacted FMMP-designated Prime Farmland to pre-construction conditions and the values of the Prime Farmland could be lost if the areas of temporary disturbance were not properly restored. Mitigation Measure AGR-01 requires SCE to restore designated Farmland that was impacted during construction to pre-construction conditions. The application of MM AGR-01 would avoid loss of Prime Farmland. *The resulting impact from construction activity would be less than significant with mitigation.*

#### Operation and Maintenance

The installation of manholes, riser poles, and subsequent vegetation maintenance activities around the Alternative 3 riser poles would permanently convert 0.15 acre of important farmland to nonagricultural use. Duct bank covers and a 25-foot radius around each riser pole would remain permanently cleared of vegetation throughout the life of the project. As described in earlier in this section, the City of Jurupa Valley treats any loss of farmland as a significant impact. MM AGR-03 requires SCE to replace or compensate for the loss of important farmland. The CPUC typically considers replacement of farmland to be adequate mitigation for permanent impacts to farmland. However, for this project the CPUC finds the City of Riverside

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finding in the 2013 RTRP EIR that any permanent loss of Farmland is significant and unavoidable to be reasonable. *The impact would be significant and unavoidable.*

**Mitigation Measures: MM AGR-01, MM AGR-03 (refer to Section 4.2.7: Revised Project Mitigation Measures)**

**Significance after Mitigation: Significant and Unavoidable**

### 4.2.10 No Project Alternative Impact Analysis

The exact quantity and locations of land disturbance that would occur under the No Project Alternative are unknown at this time. Two of SCE's relevant substations are located near designated Farmland, and one of the substations, Pedley Substation (66-kV), is located adjacent to Unique Farmland. An expansion of these two substations may result in a permanent conversion of Farmland to nonagricultural use, which would be a significant impact. Mitigation for this impact would be the same as the mitigation for Alternative 1. MM AGR-01 would not be applied in any area that would require a permanent land use conversion, such as access roads, vegetation clearance areas, and footprints of physical structures. These areas would be permanently converted to nonagricultural use for the life of the No Project Alternative. Replacement or compensation for lost Farmland, as required by MM AGR-03, would result in an overall net loss in local Farmland. Although this impact would still be considered significant and unavoidable by the City of Jurupa Valley, City of Riverside, and County of Riverside. However, the potential impacts are speculative, as the location of storage is flexible and is likely that agricultural resources would be avoided. *Therefore, with the implementation of the No Project Alternative, impacts to important farmland are most likely to result in a less than significant impact.*

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