City of Poway Treated Water Facilities & Redundant Pipeline Project

CUP 26-0003
EA 26-0003
Project No. WTR0028

Initial Study/Mitigated Negative Declaration

May 2026 | 00407.00035.001

Prepared for:

City of Poway
Planning Division
13325 Civic Center Drive, 1st Floor
Poway, CA 92064

Prepared by:

HELIX Environmental Planning, Inc.
7578 El Cajon Boulevard
La Mesa, CA 91942

This page intentionally left blank

Table of Contents

Section		Page
1.0	**Introduction**	**1**
1.1	Initial Study Information Sheet	1
2.0	**Project Description**	**2**
2.1	Project Location	2
2.2	Project Background	2
2.3	Project Components	3
2.4	Construction Methods, Schedule, and Staging	6
2.5	Construction Best Management Practices	7
2.6	Surrounding Land Uses	9
3.0	**Environmental Factors Potentially Affected**	**10**
3.1	Determination	11
4.0	**Environmental Initial Study Checklist**	**12**
4.1	Aesthetics	13
4.2	Agriculture and Forestry Resources	15
4.3	Air Quality	17
4.4	Biological Resources	20
4.5	Cultural Resources	32
4.6	Energy	36
4.7	Geology and Soils	37
4.8	Greenhouse Gas Emissions	41
4.9	Hazards and Hazardous Materials	43
4.10	Hydrology and Water Quality	47
4.11	Land Use and Planning	50
4.12	Mineral Resources	51
4.13	Noise	52
4.14	Population and Housing	56
4.15	Public Services	57
4.16	Recreation	58
4.17	Transportation	59
4.18	Tribal Cultural Resources	61
4.19	Utilities and Service Systems	62
4.20	Wildfire	64
4.21	Mandatory Findings of Significance	65
5.0	**References**	**68**
6.0	**Preparers**	**71**

Table of Contents (cont.)

LIST OF APPENDICES

A	Air Quality, Greenhouse Gas Emissions, and Energy Assessment
B	Biological Technical Report
C	Cultural Resources Technical Report
D	Geotechnical Evaluation
E	Phase I Environmental Site Assessment
F	Noise Impact Report
G	Mitigation, Monitoring, and Reporting Program

LIST OF FIGURES

No.	Title	Follows Page
1	Regional Location	2
2	Aerial Photograph	2
3	Project Components	4
4a-b	Representative Site Photos	4
5	Pump Station Rendering	4
6	Vegetation Communities/Impacts	24

LIST OF TABLES

No.	Title	Page
1	Construction Phasing and Equipment	6
2	Anticipated Roadway Closures During Construction	8
3	Maximum Daily Construction Emissions	18
4	Maximum Daily Operational Emissions	19
5	Vegetation Communities/Land Cover Types and Impacts	24
6	Poway Subarea HCP Development Requirement Conformance Summary	28
7	Construction Energy Use	36
8	Total Estimated Operational GHG Emissions	42

Acronyms and Abbreviations

AB	Assembly Bill
Barona	Barona Band of Mission Indians
BCLA	Biological Core and Linkage Area
Berglund WTP	Lester J. Berglund Water Treatment Plant
BMP	best management practice
BRCA	Biological Resource Core Area
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFG Code	California Fish and Game Code
cfs	cubic feet per second
City	City of Poway
CML&C	cement mortar lined and coated
CMU	concrete masonry unit
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
County	County of San Diego
dBA	A-weighted decibel
DOC	California Department of Conservation
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
ESA	Environmental Site Assessment
FCF	flow control facility
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas
HELIX	HELIX Environmental Planning, Inc.
HCP	Habitat Conservation Plan
hp	horsepower
HVAC	heating, ventilation, air conditioning
kW	kilowatt
L_{EQ}	time-averaged noise level

Acronyms and Abbreviations (cont.)

MBTA	Migratory Bird Treaty Act
MMBTU	million British thermal units
MOU	Memorandum of Understanding
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MT	metric tons
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
OEHHA	Office of Environmental Health Hazard Assessment
PM_{10}	particulate matter 10 microns or less in diameter
$PM_{2.5}$	particulate matter 2.5 microns or less in diameter
Poway Subarea HCP	Poway Subarea Habitat Conservation Plan/Natural Communities Conservation Plan
PPV	peak particle velocity
Project	City of Poway Treated Water Facilities & Redundant Pipeline Project
RAQS	Regional Air Quality Strategy
Ramona MWD	Ramona Municipal Water District
Rincon	Rincon Band of Luiseño Indians
ROW	right-of-way
San Pasqual	San Pasqual Band of Mission Indians
SB	Senate Bill
SCIC	South Coastal Information Center
SDAB	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SF	square feet
SO_X	sulfur oxides
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	toxic air contaminant
TCA	traditionally and culturally affiliated
VHFHSZ	Very High Fire Hazard Severity Zone
VOC	volatile organic compound
Water Authority	San Diego County Water Authority

1.0 Introduction

1.1 Initial Study Information Sheet

1.	Project title:	City of Poway Treated Water Facilities & Redundant Pipeline Project (Project No. WTR0028)
2.	Lead agency name and address:	City of Poway Planning Division 13325 Civic Center Drive, 1st Floor Poway, CA 92064
3.	Contact person and phone number:	Robert Weber, PE, Principal Civil Engineer, Public Works; (858) 668-4717
4.	Project location:	Espola Road from 500 feet south of Green Valley Truck Trail to Lake Poway Road, and Lake Poway Road from Espola Road east to the Lester J. Berglund Water Treatment Plant
5.	Project sponsor's name and address:	Same as Lead Agency
6.	General plan designation:	Public Facilities (PF), Planned Residential Development (PRD), Open Space – Recreation (OS-R)
7.	Zoning:	Public Facilities (PF), Planned Residential Development (PRD-1), Open Space – Recreation (OS-R)
8.	Description of project:	See Section 2
9.	Surrounding land uses and setting:	See Section 2

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

- San Diego County Water Authority (Water Authority) (Participation Agreement, Encroachment Permit, Member Agency Agreement)
- Ramona Municipal Water District (Ramona MWD) (Participation Agreement, Encroachment Permit)
- City of Poway (City) (Conditional Use Permit, Traffic Control Permit, Right-of-Way Permit, Storm Water Quality Management Permit, Building Permit, Tree Removal Permit, and financing approval)
- State Water Resources Control Board (SWRCB) (Stormwater and Construction General Permit)
- Division of Drinking Water (Drinking Water Permit)

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Letters inviting tribes to consult with the City under Assembly Bill (AB) 52 were sent to the list of tribes provided by the Native American Heritage Commission (NAHC) on August 21, 2023. The Barona Band of Mission Indians (Barona) responded on September 15, 2023 indicating concurrence with the management recommendations provided in the Cultural Resources Technical Report. The Rincon Band of Luiseño Indians (Rincon) responded on September 18, 2023 deferring consultation to Kumeyaay Nation given the Project site is located outside of Rincon's traditional use area. In response to informal outreach conducted as part of the cultural resources analysis, the San Pasqual Band of Mission Indians (San Pasqual) indicated interest in AB 52 consultation; however, no response to the City's consultation invitation was provided.

2.0 Project Description

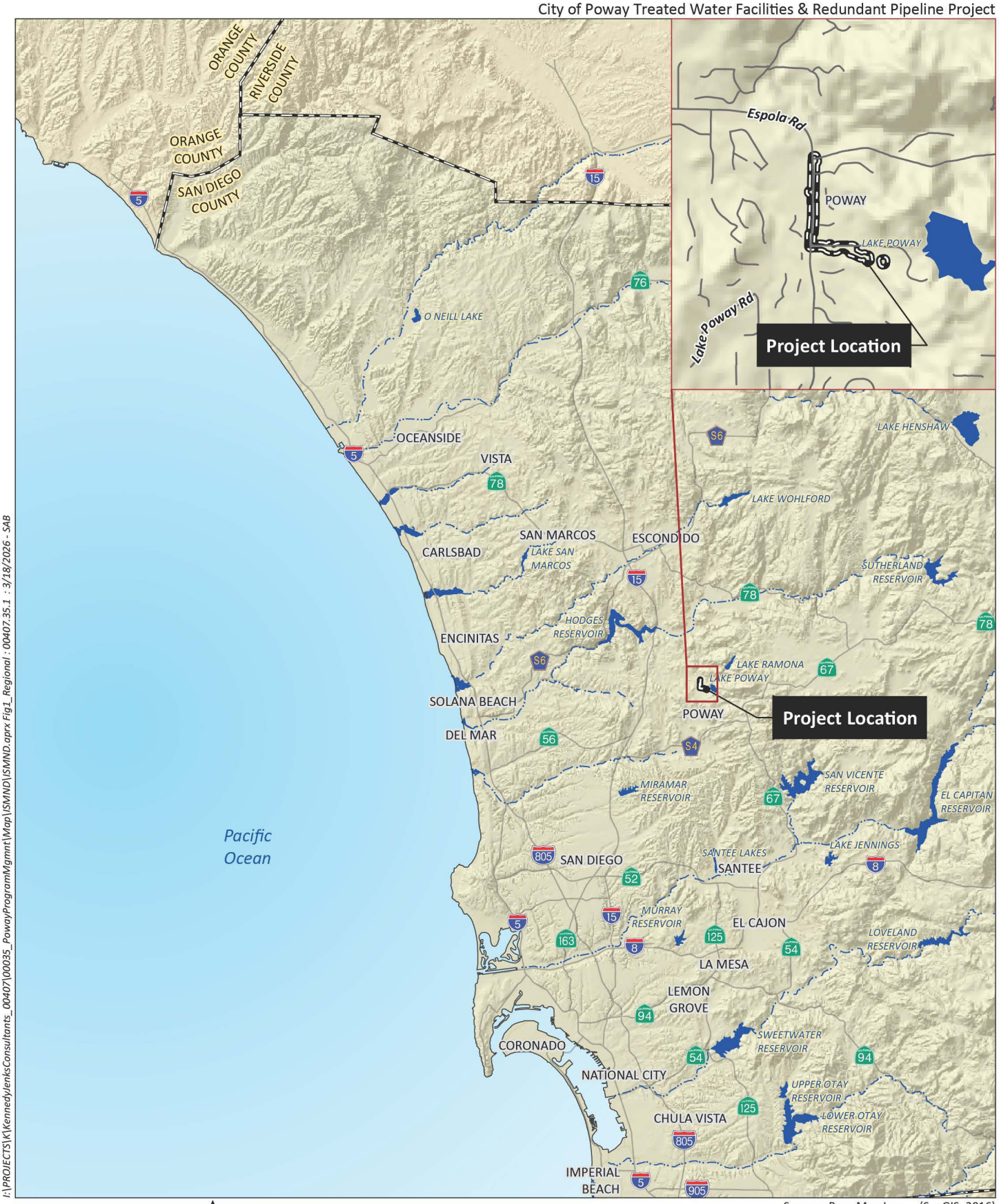
2.1 Project Location

The City of Poway Treated Water Facilities & Redundant Pipeline Project (Project No. WTR0028) (referred to as the Project) is located within the City of Poway in San Diego County (County), California (Figure 1, *Regional Location*). Specifically, the Project contains features within and along Espola Road from 500 feet south of Green Valley Truck Trail to Lake Poway Road and within Lake Poway Road east from Espola Road to the Lester J. Berglund Water Treatment Plant (Berglund WTP) where improvements to the facilities within Berglund WTP are proposed (see Figure 2, *Aerial Photograph*). The pump station and forebay tank would be located within City property (Assessor's Parcel Number 2784377400) along the south side of Lake Poway Road, approximately 1,100 feet east of Espola Road.

2.2 Project Background

Water within the City is provided through the Water Authority's First Aqueduct and two untreated water service connections that convey water either to Lake Poway for storage or to Berglund WTP for water treatment. Berglund WTP has a design capacity of 24 million gallons per day and is the only source of drinking water for Poway. Potable water produced from Berglund WTP is conveyed to the two adjacent clearwell tanks, which function as the City's primary water storage facility. Potable water from the clearwell is delivered by pressurized gravity flow to the distribution system.

Poway also provides a back-up water supply to Ramona MWD, through an agreement with the Water Authority, when the Water Authority is unable to deliver water to Ramona MWD from the RAM-3 Flow Control Facility (FCF) at the terminus of the Ramona Pipeline. For this operation, one-way flow is provided from Berglund WTP via the Water Authority's 24-inch pipeline, the Water Authority's RAM-2 FCF and Ramona MWD's 27-inch pipeline. To enable this operation, the facilities are required to be flushed, disinfected and tested prior to the delivery of water since these facilities are only used on an infrequent basis. The proposed Project would construct new facilities to replace the operation of these facilities to enable two-way flow deliveries, either from Poway to Ramona MWD or Water Authority to Poway. In addition, the new facilities would be placed into full-time service to enable the timely delivery of water to either Poway or Ramona MWD and to eliminate wasting water from the water flushing activity.



I:\PROJECTS\K\KennedyJenksConsultants_00407\00035_PowayProgramMgmnt\Map\SMND\SMND.aprx Fig1_Regional : 00407.35.1 : 3/18/2026 - SAB

0 8 Miles

Source: Base Map Layers (SanGIS, 2016)

HELIX Environmental Planning

Regional Location

Figure 1



I:\PROJECTS\K\KennedyJenksConsultants_00407\00035_PowayProgramMgmnt\Map\SMND\SMND.aprx Fig2_Aerial : 00407.35.1 : 4/6/2026 - SAB

HELIX
Environmental Planning

Aerial Photograph

Figure 2

In 2008, the City adopted a Potable Water Master Plan Update that identified a capital improvement project that would install a redundant pipeline facility to the existing 36-inch pipeline in Lake Poway Road, which delivers 100 percent of the City's water supply from Berglund WTP to the distribution system near Espola Road. The proposed Project would implement this redundant pipeline facility.

Subsequently, as part of a Settlement Agreement and Release between the City and the SWRCB Division of Drinking Water to improve the City's reliability and diversity of water supply, the City prepared a Treated Water Service Connection Facility Planning Study (Kennedy/Jenks Consultants, Inc. 2021) in conjunction with the Water Authority and a Treated Water Facilities Preliminary Design Report (Black & Veatch 2022). In addition, an updated Treated Water Service Connection Facility Planning Study (Black & Veatch 2026) was prepared to address changes to the Project.

In November 2025, the City of Poway, Ramona MWD, and the Water Authority entered into a Memorandum of Understanding (MOU) to facilitate the delivery of potable water from the Water Authority to Poway and the delivery of potable water from Poway to the Ramona MWD. As part of the MOU, the entities were assigned different responsibilities for the facility improvements. The Water Authority would be responsible for abandoning the existing 24-inch and 27-inch pipelines and adding the new POW-6 FCF and associated pipeline improvements to the existing Water Authority Ramona Pipeline. These improvements would be designed, constructed, owned, and operated by the Water Authority.

The City would be responsible for the design and construction of the pump station, forebay, and associated pipelines including the 30-inch Espola Road pipeline. The City and Water Authority components are hereby defined as the proposed Project. The POW-6 FCF component of the Project is in the preliminary design process and has been incorporated into this Project Description and analyzed in the checklist in Section 4.0 based on the most recently available information. As the design advances, if the Water Authority determines additional environmental review is required to reflect changes to the design of POW-6 FCF and its resulting environmental effects, that environmental review would be completed by the Water Authority prior to Project approval.

2.3 Project Components

The Project proposes to construct new water facilities to replace and abandon existing water facilities and provide up to 24 cubic feet per second (cfs) of treated water to the City. Since the untreated water connection to the First Aqueduct is the only source of water to Lake Poway and Berglund WTP, the proposed Project would provide a source of treated water to the City. The availability of a treated water source would also provide greater flexibility for the City to perform necessary repair and replacement work within Berglund WTP in the future. The proposed improvements are discussed in detail below and their locations are shown on Figure 3, *Project Components*. See Figures 4a and 4b, *Representative Site Photos*, for images of select Project component locations.

2.3.1 New POW-6 FCF

This component of the proposed Project includes the Water Authority's construction of a new FCF to provide treated water and a connection to the Water Authority's Ramona Pipeline. The POW-6 FCF would be constructed within and adjacent to the existing RAM-3 FCF footprint and would be located partially below ground. The facility would include a throttling valve, venturi meter, and downstream and upstream isolation valves.

2.3.2 New 30-inch Pipeline from POW-6 FCF to Lake Poway Road

This component of the Project would include construction of 3,400 feet of 30-inch pipeline between the downstream connection to the future POW-6 FCF to the intersection of Lake Poway Road and the Water Authority's First Aqueduct (approximately 600 feet east of the Espola Road/Lake Poway Road intersection) that would allow for two-way flow delivery. This pipeline would replace the existing 24-inch Water Authority pipeline and the existing 27-inch Ramona pipeline; these pipelines would be abandoned in place by the Water Authority during construction of the POW-6 FCF. An isolation valve and meter vault would be constructed at the northern extent of the pipeline east of Espola Road, adjacent to the Water Authority POW-6 FCF. Up to five trees would be removed during construction of the new vault. This pipeline would also include the installation of an underground vault connection to the existing 20-inch 865 Pressure Zone pipeline to the proposed 30-inch pipeline on the west side of Espola Road approximately 610 feet south of Country Day Road.

2.3.3 New 36-inch Transmission Pipeline within Lake Poway Road to Forebay Tank/Pump Station

The Project also includes construction of 800 feet of 36-inch pipeline from the crossing of the First Aqueduct in Lake Poway Road to the new booster pump station. This pipeline would enable the flow delivery between the Water Authority and the City as well as serving as a portion of the proposed redundant pipeline.

2.3.4 New Booster Pump Station

Due to the difference in elevation, a pump station would be required to transport water between the future POW-6 FCF and Berglund WTP clearwells. The site of the booster pump station would be on an existing parking lot on the south side of Lake Poway Road (see Figure 4b). The parking lot would be partially demolished, and a 1,950-square-foot (SF) (54-foot by 36-foot) pump station building would be constructed. The building would house the booster pump station equipment, utilizing two separate interior rooms, the pump room and electric room. The pump room would contain four vertical turbine pumps having a combined rated capacity of 24 cfs and 105 feet of total dynamic head. A 450-kilowatt (kW) backup generator adjacent to this building would be housed in a sound attenuation enclosure and surrounded by concrete masonry unit (CMU) walls on three sides.

Three below-ground vaults would be installed on the site to house the flow direction butterfly valves, the discharge flow meter, and the pump station isolation valves. The vaults are anticipated to be cast-in-place concrete structures with access hatches for equipment removal. Each vault would include sumps to collect any residual flows from surface runoff or the piping.

The architectural design of the pump station building is intended to blend in with the surrounding community. The design would comply with Poway's community design themes and historic and small-town character as well as providing resiliency for wildfires. The single-story CMU building would have a rectangular form with a sloped metal roof. Roof materials would be low glare/reflection. Exterior walls would use natural stone colors (concrete block with integral colors), with no exterior glazing. See Figure 5, *Pump Station Rendering*.

The proposed below-grade yard piping for the pump station consists of approximately 225 feet of 36-inch steel cement mortar lined and coated (CML&C) suction header and approximately 160 feet of 36-inch



I:\PROJECTS\K\KennedyJenksConsultants_00407\00035_PowayProgramMgmnt\Map\ISMND\ISMND.aprx Fig3_Components : 00407.35.1 : 3/18/2026 - SAB

HELIX Environmental Planning

Project Components

Figure 3



Existing pump station to be demolished.

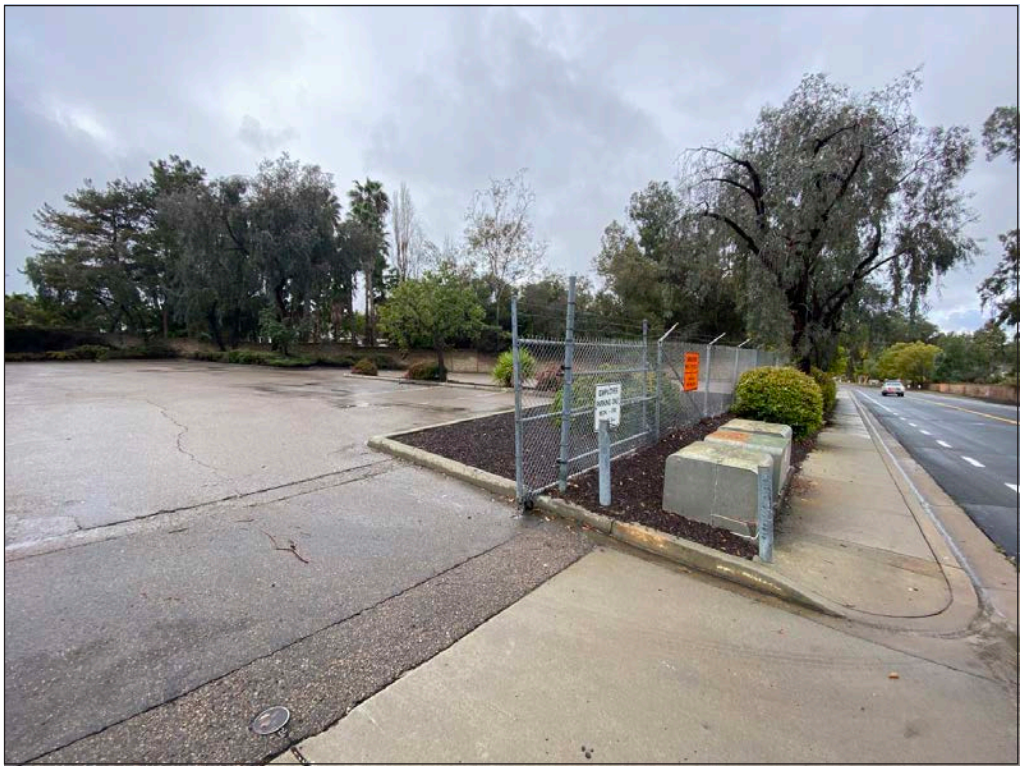


Proposed flow control facility and vault location, view looking northeast.

G:\PROJECTS\Biology\K\KennedyJenksConsultants_00407\KJC-35_PowayPrgManagementServices_Photos\PhotoSheets\Photo Pages

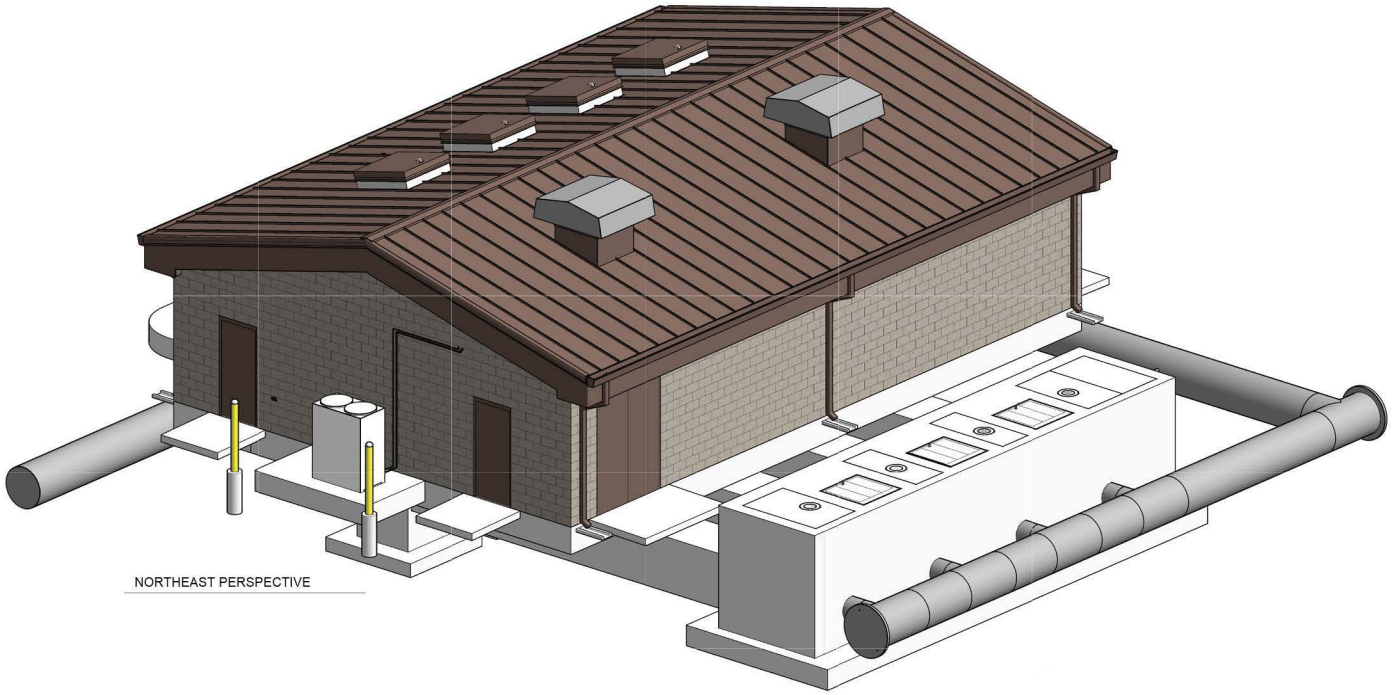


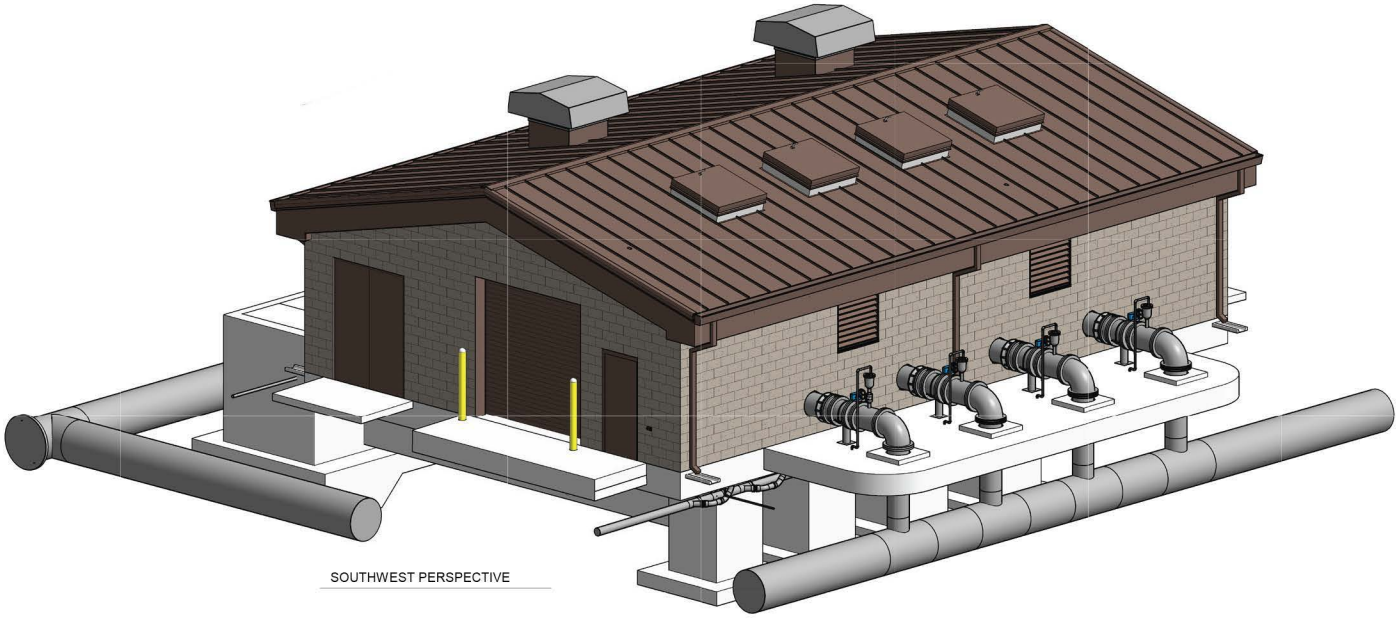
Proposed pump station and forebay tank location, view looking south.



Proposed pump station and forebay tank location, view looking southwest.

G:\PROJECTS\Biology\K\KennedyJenksConsultants_00407\KJC-35_PowayPrgManagementServices_Photos\PhotoSheets\Photo Pages





I:\PROJECTS\K\KennedyJenksConsultants_00407\00035_PowayProgramMgmnt\Map\SMND\Fig5_PumpSta.indd 00407.35.1 7/17/2025 - SAB

Source: Black & Veatch, 2023

HELIX Environmental Planning

Pump Station Rendering

Figure 5

CML&C steel discharge header. Limited landscaping is currently proposed for the pump station site and along Lake Poway Road where the pipeline construction occurs outside of the roadway limits but within the City right-of-way (ROW). Approximately 20 eucalyptus trees in this area would be removed during construction and would not be replaced due to their high fire risk and potential for root damage to the pipeline. A 1,370 SF biofiltration catch basin would be installed west of the pump station.

Sufficient access would be provided to the booster pump station for major and routine maintenance. The existing driveway on the north side of the site would be retained, and the existing gate would be replaced. A secondary driveway with a gate would be constructed at the west end of the site. The proposed site layout and grading provide a 15-foot clear space around the booster pump station and forebay tank to accommodate vehicle and personnel access. The existing chain link fence on the north side of the site would be replaced by an approximately 8-foot-tall CMU wall to match the site's existing CMU walls.

2.3.5 New Forebay Tank

In addition to the pump station, a forebay tank would be provided directly south of the pump station to supply a consistent flow of water from the FCF to the booster pump station, while also supporting additional storage in the event of a power outage. A 297,000-gallon welded steel forebay tank would be constructed, which would be 50 feet in diameter and 20 feet in height. The base of the tank would be at an elevation of approximately 803 feet. Additionally, 160 feet of 24-inch forebay tank overflow would convey water from the forebay tank to an existing storm drain located in the northwest corner of the parking lot.

2.3.6 New 36-inch Pipeline from Pump Station/Forebay Tank to Clearwells

The proposed pipeline connecting the pump station piping to the tie-in location located on the Berglund WTP southeast of the Maintenance and Operations Facility consists of approximately 660 feet of 36-inch CML&C steel pipe. This alignment would meet the yard discharge piping at the southeast corner of the pump station site and travel along the southern property line southwest of the vehicle maintenance parking lot. Around the southeast edge of the parking lot, the proposed alignment jogs slightly north through the sloped landscaping to run parallel to the stairway. At the top of the slope the alignment would travel between the warehouse and vehicle storage until terminating at the 36-inch tee tie-in location. This pipeline would enable the flow delivery between the Water Authority and Poway as well as serving as the final portion of the redundant pipeline.

2.3.7 Sodium Hypochlorite Storage & Feed Facility

A sodium hypochlorite system would be installed to boost chlorine levels in the Water Authority treated water delivered to the clearwells at the Bergland WTP. The system would store deliveries of sodium hypochlorite (12.5 percent solution) in a 5,580-gallon tank with three metering pumps to dose the clearwell influent. Chlorine levels would be monitored in the pump station discharge pipe and downstream of the injection point to control for appropriate concentrations.

The system would require installation of one sodium hypochlorite storage tank and three metering pumps southeast of the clearwells near an existing storage building facility. Improvements to the existing ammonia feed system would consist of installing two metering pumps.

2.3.8 New Surge Tank

A 5,000-gallon surge tank would be installed within the existing Operations Yard, along with associated piping and appurtenances.

2.3.9 Demolition of Existing Pump Station

As part of the Project, the existing pump station shown in Figure 4a would be demolished. The existing pump station, which is located approximately 700 feet east of the Espola Road intersection on the south side of Lake Poway Road, is no longer in service. Below grade piping and conduit would be disconnected and either removed or capped and abandoned in place.

2.4 Construction Methods, Schedule, and Staging

The Project would be constructed in a single phase. The anticipated schedule is shown in Table 1, *Construction Phasing and Equipment*.

Table 1
CONSTRUCTION PHASING AND EQUIPMENT

Stage	Component	Construction Start	Construction Complete	Anticipated Construction Equipment
1	Demolition of existing pump station	June 2027	June 2027	Crane, tractor/ loader/ backhoe, rubber-tired dozer, dump truck, ready mix concrete truck, generator set
2	Construction of 30-inch transmission pipeline in Espola Road including vault connection (30-inch and 20-inch Pipeline Intertie) and new valve vaults for the connection to Ramona MWD's 27-inch pipeline	November 2027	June 2028	Excavator, loader, 2 dump truck, asphalt milling machine, roller, paver, crane, tractor/ loader/ backhoe, ready mix concrete truck, generator set
3	Construction of 30-inch pipeline in Lake Poway Road from Espola Road to the First Aqueduct Crossing	November 2027	June 2028	Excavator, loader, 2 dump truck, asphalt milling machine, roller, paver, ready mix concrete truck, generator set
4	Construction of new pump station and forebay tank	August 2027	March 2029	Excavator, loader, 2 dump truck, roller, paver, crane, 2 tractor/ loader/ backhoe, grader, 2 forklifts, ready mix concrete truck, generator set
5	Construction of 36-inch pipeline adjacent to Lake Poway Road from the First Aqueduct Crossing to the new pump station	January 2028	March 2028	Excavator, loader, 2 dump truck, grader, ready mix concrete truck, generator set

Stage	Component	Construction Start	Construction Complete	Anticipated Construction Equipment
6	Construction of 36-inch pipeline from pump station to clearwell tanks	March 2028	May 2028	Excavator, loader, 2 dump truck, asphalt milling machine, roller, paver, ready mix concrete truck, generator set
7	Surge Tank	March 2028	May 2028	Tractor/loader/backhoe, crane, ready mix concrete truck, generator set
8	Disinfection Facility (Sodium Hypochlorite Storage)	May 2028	December 2028	Crane, forklift, excavator, loader, ready mix concrete truck, generator set
9	POW-6 FCF	January 2028	August 2029	Excavator, loader, 2 dump truck, ready mix concrete truck, generator set

Source: Kennedy/Jenks Consultants, Inc. 2025

For the transmission pipeline and pump station construction activities, it is anticipated that construction staging would be in an area in the eastern portion of the existing Operations Center parking lot (proposed Forebay and Pump Station site), the Berglund WTP site, and parking lots within the City's Lake Poway Recreational Area. Staging for Water Authority construction activities would occur in the disturbed area surrounding the proposed vault. Transmission pipeline installation would occur through open trenching. Trenches are anticipated to be approximately 5 feet in width and range in depth from 8 to 18 feet. Work within the intersection of Espola Road and Lake Poway Road or within the POW-6 FCF vault area may occur at night to avoid daytime roadway closures.

Soil excavated via trenching is anticipated to be suitable for backfill except for within the pipe bedding area, which would be filled with imported sand. It is estimated that approximately 3,250 cubic yards of soil would be exported for this purpose, with a corresponding import of sand. Grading for the pump station would require approximately 500 cubic yards of fill material to be imported.

2.5 Construction Best Management Practices

2.5.1 Air Quality

Construction would implement standard dust control measures as required to comply with San Diego County Air Pollution Control District (SDAPCD) Rule 55, including watering two times daily during grading, ensuring that all exposed surfaces maintain a minimum soil moisture of 12 percent, and limiting vehicle speeds on unpaved roads to 15 miles per hour. All trucks hauling dirt, sand, soil, or other loose materials would be covered with a fabric cover and maintain a freeboard height of 12 inches.

2.5.2 Biological Resources

During construction of the POW-6 FCF component, the Water Authority would implement the applicable standard measures provided in Section 6.4 of the Water Authority's Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP; Water Authority 2010).

2.5.3 Fire Safety

To minimize the risk of losses resulting from wildfire, the following measures would be implemented during construction of the Project:

- Construction within areas of dense foliage during dry conditions will be avoided, when feasible.
- In cases where avoidance is not feasible, brush fire prevention and management practices will be incorporated. Specifics of the brush management program will be approved by the Fire Department and incorporated into Project construction documents.

2.5.4 Traffic Control Plan

A traffic control plan would be implemented as part of construction. The following traffic control criteria have been identified using local and regional standards:

- Maintain a minimum of one travel lane open for vehicles in both directions along Espola Road.
- Maintain a minimum of one travel lane open for vehicles, with a flagman, along Lake Poway Road.
- Maintain access to bicyclists and pedestrians.
- Provide detour plans, as necessary.
- Provide detour plan to pedestrian facility closures.
- Provide access to all driveways.
- Provide equal consideration for vehicles, pedestrians, and bicyclists.
- Maintain safety for all workers, motorists, pedestrians, and bicyclists.

Table 2, *Anticipated Roadway Closures During Construction*, provides information regarding potential road lane closures during the various phases of construction.

Table 2
ANTICIPATED ROADWAY CLOSURES DURING CONSTRUCTION

Stage	Description	Location	Roadway Closures
1	Demolition of existing pump station	South of Lake Poway Road, approximately 680 feet east of the intersection with Espola Road	Lake Poway Road • Closure of eastbound lane & bike lane • Closure of the south sidewalk
2	Construction of 30-inch transmission pipeline in Espola Road including vault connection (30-inch and 20-inch pipeline intertie) and new valve vaults for the connection to Ramona	Espola Road from future POW-6 to Lake Poway Road.	Espola Road at RAM-3 • Closure of northbound number one lane • Closure of the east sidewalk & bike lane Espola Road (RAM-3 to Lake Poway Road) • Closure of southbound number two lane • Closure of northbound number two lane • Closure of median & left turn lane Espola Road at 20-inch pipeline inter-tie • Closure of southbound number one lane

Stage	Description	Location	Roadway Closures
	MWD's 27-inch pipeline		• Closure of the west sidewalk & bike lane Espola Road at Lake Poway Road • Closure of northbound number one lane • Closure of the left turn lane from Espola Road to Lake Poway Road • Closure of Lake Poway Road eastbound lane and south sidewalk
3	Construction of 30-inch pipeline in Lake Poway Road from Espola Road to the First Aqueduct Crossing	Within Lake Poway Road from Espola Road to the First Aqueduct Crossing	Lake Poway Road • Full road closure, closure of westbound and eastbound lane (one-way traffic alternatively allowed with use of flagging) and bike lane • Closure of the south sidewalk
4	Construction of new pump station and forebay tank	South of Lake Poway Road, approximately 1,000 feet east of the intersection with Espola Road	Lake Poway Road • Closure of eastbound lane & bike lane • Closure of the south sidewalk
5	Construction of 36-inch pipeline adjacent to Lake Poway Road from the First Aqueduct Crossing to the new pump station	Adjacent to Lake Poway Road from the First Aqueduct Crossing to the new pump station	Lake Poway Road • Closure of eastbound lane & bike lane • Closure of the south sidewalk
6	Construction of 36-inch pipeline from pump station to clearwell tanks	Within existing Berglund WTP and Operations Yard	None
7	Surge Tank	Within existing Operations Yard	None
8	Disinfection Facility (Sodium Hypochlorite Storage)	Within existing Berglund WTP	None
9	POW-6 FCF	Adjacent to Espola Road at existing RAM-3 FCF, approximately 500 feet north of Country Day Road	Espola Road • Closure of northbound number one lane • Closure of the east sidewalk & bike lane

Source: Kennedy/Jenks Consultants, Inc. 2025

2.5.5 Water Quality

All Project construction activities would conform with applicable elements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, including implementation of site-specific best management practices (BMPs) identified during the Stormwater Pollution Prevention Plan (SWPPP) preparation process for the Project.

2.6 Surrounding Land Uses

Land uses to the north of the Project site are designated and zoned for open space (Blue Sky Reserve) and include undeveloped land and an archery range, to the south are larger lot single-family residential homes, to the east is Lake Poway Recreational Area, and to the west are single-family residences.

3.0 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☐ None		
☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology and Soils	☐ Greenhouse Gas Emissions	☒ Hazards and Hazardous Materials
☐ Hydrology and Water Quality	☒ Land Use and Planning	☐ Mineral Resources
☒ Noise	☐ Population and Housing	☐ Public Services
☐ Recreation	☐ Transportation	☒ Tribal Cultural Resources
☐ Utilities and Service Systems	☐ Wildfire	☒ Mandatory Findings of Significance

3.1 Determination

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that, although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT (EIR) is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An EIR is required, but it must analyze only the effects that remain to be addressed.

☐ I find that, although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature — Date: 5/6/2026

KEVIN PARKER, AICP
Printed name

City of Poway
For

4.0 Environmental Initial Study Checklist

The lead agency has defined the column headings in the environmental checklist as follows:

A. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

B. "Less Than Significant with Mitigation Incorporated" applies where the inclusion of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." All mitigation measures are described, including a brief explanation of how the measures reduce the effect to a less than significant level. Mitigation measures from earlier analyses may be cross-referenced.

C. "Less Than Significant Impact" applies where the project does not create an impact that exceeds a stated significance threshold.

D. "No Impact" applies where a project does not create an impact in that category. "No Impact" answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project specific screening analysis).

The explanation of each issue identifies the significance criteria or threshold used to evaluate each question; and the mitigation measure identified, if any, to reduce the impact to less than significance. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other California Environmental Quality Act (CEQA) process, an effect has been adequately analyzed in an earlier EIR or negative declaration [CEQA Guidelines Section 15063(c)(3)(D)]. Where appropriate, the discussion identifies the following:

a) Earlier Analyses Used. Identifies where earlier analyses are available for review.

b) Impacts Adequately Addressed. Identifies which effects from the checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and states whether such effects were addressed by mitigation measures based on the earlier analysis.

c) Mitigation Measures. For effects that are "Less Than Significant with Mitigation Incorporated," describes the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

4.1 Aesthetics

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. According to the City's General Plan Community Development Element, significant visual features include the mountains surrounding the City (City 1991). In addition, Goal IV and corresponding strategies of the City's General Plan Natural Resources Element state in part that it is the goal of the City to reserve its scenic resources through the preservation of scenic areas, prominent vistas, and open space (City 1991). Additionally, the City's Transportation Master Element identifies views from Espola Road as having scenic value (City 2010).

During construction, equipment would be temporarily visible in the Project area but would be removed upon completion of construction. The non-operational pump station on Lake Poway Road would be demolished and removed.

Once operational, the Project would introduce new water treatment features in the Project area. Transmission pipelines would be below ground and would not be visible or result in changes to scenic vistas. Visible features that would be introduced to the Project area include the pump station, forebay tank, sodium hypochlorite facility, and surge tank. As the majority of the Project components would be below ground and new access locations would occur at the ground level, no adverse change to scenic vistas from Espola Road would occur as a result of the Project. The above ground components described previously would be installed at the City's existing Berglund WTP facility. Specifically, the sodium hypochlorite storage tank and pumps as well as the proposed surge tank would be located adjacent to existing structures and would not block scenic vistas. The pump station and forebay tank would be located in an existing parking lot and may be visible from residences north, south, and east of the existing parking area. The forebay tank would be 20 feet in height and approximately 20 feet above the finished

grade. As shown in Figure 4b, dense trees surround this area and the residences to the south and west are located at a higher elevation (approximately 5 to 15 feet) than the existing parking lot. Therefore, views of the of the forebay tank would be screened by existing vegetation. From higher elevations, where views of surrounding mountains are not already interrupted by existing vegetation, views over the top of the forebay tank would remain. The pump station building would be approximately 15 feet in height and adjacent to the forebay tank; therefore, it would not interrupt surrounding views. Given the existing vegetation and topography, the Project would not result in a substantial adverse effect on scenic vistas in the Project area and impacts would be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The nearest officially designated state scenic highway to the Project site is a portion of State Route 52, approximately 10.5 miles to the south (California Department of Transportation [Caltrans] 2019). Due to this distance, the Project site is not visible from a state scenic highway. Portions of the Project site, specifically those located along Espola Road, are surrounded by trees that are within a landscaped buffer between the roadway and residential development. In accordance with Poway Municipal Code Chapter 13.32, native trees would be required to be replanted while eucalyptus trees that would be removed are not anticipated to be replaced (refer to response to item 4.4 e for further discussion). However, the Project would not result in removal of a large number of trees such that damage to the overall viewshed would occur as trees would continue to surround Espola Road on both sides. As the Project would not be visible from a state scenic highway and would not alter scenic resources surrounding the Project site, no impact would occur.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. Public Resources Code 21071 defines the term “urbanized area” for the purpose of CEQA to mean an incorporated city that has a population of at least 100,000 persons or has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons. U.S. Census Bureau data for 2024 indicates that the City has a population of 49,435 but is contiguous with the City of San Diego, which has a population of 1,404,452 (U.S. Census Bureau 2024). Therefore, the Project site is within an urbanized area and is evaluated relative to applicable zoning and other regulations governing scenic quality.

The Project would develop a combination of underground features within ROWs and aboveground structures within City properties zoned as Public Facilities and Planned Residential Development. These zones are not intended for the protection of scenic resources, nor are there other land use regulations that govern scenic quality that apply to the Project site (i.e., scenic corridor, scenic overlay zone, etc.).

The architecture of the proposed aboveground facilities would blend in with the surrounding community. Architectural considerations include the use of a neutral color palette and low glare materials. A variety of textures would be used to create visual interest and avoid a utilitarian design. Moreover, roofs of buildings, such as the pump station (see Figure 5), would be sloped to mimic the design of the surrounding residential land uses. The Project would not substantially degrade the visual character of the community or conflict with regulations governing scenic quality. Impacts would be less than significant.

d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The majority of Project construction would occur between 7:00 a.m. and 5:00 p.m. in accordance with Poway Municipal Code Section 8.08.100. Construction occurring during daylight hours would not require major light sources and would not be a substantial source of glare. An exception to the typically permitted hours of construction from the City Engineer may be required to install part of the proposed pipeline within the intersection of Espola Road and Lake Poway Road or to construct the POW-6 FCF. During these periods, construction lighting would be required temporarily. However, the lighting would be removed at the conclusion of construction and would not substantially affect views in the long term. Once operational, underground infrastructure components would not require lighting. Proposed vaults would contain automatic interior lighting and manual exterior lighting that would be used only as needed during infrequent maintenance activities. Similarly, the aboveground City facilities such as the pump station would not require substantial lighting, as typical access would occur during the daytime hours. Lighting would be installed to allow nighttime access and facility security but would not be a substantial new source of light as lighting would be consistent with existing Berglund WTP development. Aboveground Project structures would be constructed of materials such as concrete or painted steel that do not generate substantial glare. The Project would not introduce substantial sources of light or glare that would adversely affect day or nighttime views in the Project area and impacts would be less than significant.

4.2 Agriculture and Forestry Resources

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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?

No Impact. The California Department of Conservation (DOC) Farmland Mapping and Monitoring Program online mapping tool identifies the Project site as Urban and Built Up Land and Other Land (DOC 2020). Urban and Built Up Land is defined as land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land. Lands within these designations do not contain agricultural uses or areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impact would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. Please see response to item 4.2 a. Williamson Act lands are restricted preserves for agricultural and compatible open space uses. The Project would occur primarily within existing roadway ROW and the developed Berglund WTP facility, none of which are zoned for agricultural use or restricted by a Williamson Act contract. No impact would occur.

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))?

No Impact. Forest land is land that can support ten-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources. Timberland is land, other than land designated as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products. A timberland production zone is an area that is zoned for and devoted to growing and harvesting timber along with compatible uses. The Project site is not zoned for forest land, timberland, or Timberland Production, as it consists of developed roadways and land within the Berglund WTP area. No impact would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. See response to item 4.2.c. The Project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

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?

No Impact. As discussed further in items 4.2.a through 4.2.d above, the proposed Project would occur within Urban and Built-Up Land and Other Land that does not contain agriculture or forestry resources. Implementation of the proposed Project would not involve changes to the existing environment or result in the conversion of Farmland to non-agricultural use or forest land to non-forest use. No impact would occur.

4.3 Air Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The discussion below is based on the Air Quality, Greenhouse Gas Emissions, and Energy Assessment prepared by HELIX Environmental Planning, Inc. (HELIX; 2026a), attached to this Initial Study as Appendix A.

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The Project is located within the San Diego Air Basin (SDAB). The SDAPCD and San Diego Association of Governments are responsible for developing and implementing the clean air plan for attainment and maintenance of the federal and state ambient air quality standards in the SDAB. The current regional air quality plan to attain the national ambient air quality standard for ozone for the County is SDAPCD's 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (Attainment Plan), which would be a revision to the state implementation plan (SDAPCD 2020). The regional air quality plan to achieve the state ambient air quality standard for ozone is SDAPCD's 2022 Regional Air Quality Strategy (RAQS; SDAPCD 2023). These plans accommodate emissions from all sources, including natural sources, through implementation of control measures, where feasible, on stationary sources to attain the standards. A project would be considered inconsistent with the applicable air quality plans, the Attainment Plan and RAQS, if it is inconsistent with the population and employment growth assumptions within the General Plan or if the project's emissions would exceed the applicable thresholds, as analyzed in item 4.3.b, below.

The Project includes water infrastructure improvements that would provide treated water service improvements and redundancy for the City's water system. The Project would not result in population or employment increases and, therefore, would not exceed the growth projection assumptions in the Attainment Plan or RAQS. The relatively small number of workers (approximately 10-20 daily depending on construction phases) that construct the Project would be recruited from the local pool of labor and are not likely to exceed growth estimates for the area. The proposed improvements would serve existing

and planned development and would not create conditions for the creation of new housing, which would thereby induce population growth. Furthermore, as discussed in response to item 4.3.b, the Project would not generate short-term or long-term emissions that could potentially cause an increase in the frequency or severity of existing air quality violations; cause or contribute to new violations; or delay timely attainment of air quality standards. As such, the Project-related emissions are accounted for in the Attainment Plan and RAQS, which are crafted to bring the SDAB into attainment for all criteria pollutants. Accordingly, the Project would be consistent with the Attainment Plan, RAQS, and applicable portions of the State Implementation Plan, thus resulting in a less than significant impact.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. The Project would generate criteria pollutants in the short-term during construction and long-term during operation. The SDAPCD has established daily emission thresholds in Rule 20.2 for the preparation of Air Quality Impact Assessments, which are used as the applicable significance criteria in this analysis (SDAPCD 2019). In the absence of a SDAPCD threshold for volatile organic compounds (VOCs), the City of San Diego threshold was used in this analysis (City of San Diego 2022).

Criteria pollutant emissions for Project construction and operation were calculated using the California Emissions Estimator Model (CalEEMod), Version 2022.1 (California Air Pollution Control Officers Association [CAPCOA] 2022). CalEEMod construction phase inputs included the construction schedule and equipment provided in Table 1, 500 cubic yards of soil import to the pump station site, 3,250 cubic yards of soil export from pipeline excavations, 3,250 cubic yards of sand import for soil beddings, and implementation of dust control measures contained in SDAPCD Rule 55. The results of the calculations for Project construction are shown in Table 3, *Maximum Daily Construction Emissions*. The data are presented as the maximum anticipated daily emissions for comparison with the applicable thresholds.

Table 3
MAXIMUM DAILY CONSTRUCTION EMISSIONS

Year	Pollutant Emissions (pounds per day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2027	4.3	34.0	48.6	0.1	2.4	1.5
2028	7.8	61.1	84.7	0.2	4.4	2.6
2029	2.9	23.0	30.7	0.1	1.6	1.0
Maximum Daily Emissions	**7.8**	**61.1**	**84.7**	**0.2**	**4.4**	**2.6**
Daily Thresholds	*137*	*250*	*550*	*250*	*100*	*67*
Exceed Thresholds?	***No***	***No***	***No***	***No***	***No***	***No***

Source: HELIX 2026a
VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides;
PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Operation of the Project was assumed to commence in 2030 and include testing of the 450-kW emergency generator for up to 4 hours in one day as a source of criteria pollutants. Operational emission modeling results are shown in Table 4, *Maximum Daily Operational Emissions*, and the data are presented for comparison with the applicable daily thresholds. The Project's emergency generator would be tested for four hours once per year and for one hour once per month; therefore, the pollutant

emissions provided in Table 4 are a conservative estimate of the maximum daily emissions as the generator would not be tested daily.

Table 4
MAXIMUM DAILY OPERATIONAL EMISSIONS

Emission Category	Pollutant Emissions (pounds per day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Emergency Generator	4.0	11.0	10.1	<0.1	0.6	0.6
Energy	-	-	-	-	-	-
Maximum Daily Emissions[1]	**4.0**	**11.0**	**10.1**	**<0.1**	**0.6**	**0.6**
Daily Thresholds	*137*	*250*	*550*	*250*	*100*	*67*
Exceed Thresholds?	***No***	***No***	***No***	***No***	***No***	***No***

Source: HELIX 2026a

[1] Totals may not sum due to rounding.

VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

As shown in Tables 3 and 4, the Project's construction and operational emissions would not exceed the applicable thresholds. Therefore, the Project would not result in a cumulatively considerable net increase of any criteria pollutant and impacts would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved and are referred to as sensitive receptors. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. Residences located immediately adjacent to the Project site are considered sensitive receptors near the Project.

Implementation of the Project would result in the use of heavy-duty construction equipment, haul trucks, on-site generators, and construction worker vehicles. These vehicles and equipment could generate the toxic air contaminant (TAC) diesel particulate matter (DPM). Generation of DPM from construction projects typically occurs in a localized area (e.g., at the project site) for a short period of time. Because construction activities and subsequent emissions vary depending on the phase of construction (e.g., grading, building construction), the construction-related emissions to which nearby receptors are exposed to would also vary throughout the construction period. During some equipment-intensive phases such as grading, construction-related emissions would be higher than other less equipment-intensive phases. Concentrations of mobile-source DPM emissions are typically reduced by 70 percent at approximately 500 feet.

The dose (of TAC) to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has with the substance; a longer exposure period to a fixed quantity of emissions would result in higher health risks. Current models and methodologies for conducting cancer health risk assessments are associated with longer-term exposure periods (typically 30 years for individual residents based on guidance from the Office of Environmental Health Hazard Assessment [OEHHA]) and are best suited for evaluation of long duration TAC emissions with predictable schedules and locations. These assessment models and methodologies do not correlate well with the temporary and highly variable nature of construction activities. Cancer potency factors are based on animal lifetime studies or worker studies

where there is consistent long-term exposure to the carcinogenic agent. There is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime (OEHHA 2015). Considering this information, the highly dispersive nature of DPM, and the fact that construction activities would occur at various locations and varying intensities throughout the Project site, it is not anticipated that construction of the Project would expose sensitive receptors to substantial DPM concentrations. Impacts would be less than significant.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. Emissions from construction equipment, such as diesel exhaust, may generate odors; however, these odors would be temporary, intermittent, and not expected to affect a substantial number of people. Additionally, noxious odors would be confined to the immediate vicinity of construction equipment. Furthermore, short-term construction-related odors are expected to cease upon Project buildout. Long-term operation of the Project would be similar to existing conditions and would not be a substantial source of objectionable odors. Therefore, the Project would not create objectionable odors affecting a substantial number of people, and the impact would be less than significant.

4.4 Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

The discussion below is based on the Biological Technical Report prepared by HELIX (2026b), attached to this Initial Study as Appendix B. The Biological Technical Report included a general biological survey, literature review, and preliminary jurisdictional delineation.

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant with Mitigation Incorporated. The Project site primarily consists of developed ROWs and developed City buildings and infrastructure. However, portions of the Project would occur outside of existing ROWs within disturbed areas and vegetated areas supporting both native and non-native habitats. A total of eight vegetation communities or land cover types were observed within the biological survey area: southern willow scrub, disturbed wetland, Diegan coastal sage scrub (including disturbed phase), non-native grassland, non-native vegetation, eucalyptus woodland, disturbed habitat, and developed land.

No special-status plant species were observed or detected within the survey area during the biological surveys. However, based on factors such as the presence of suitable soils, hydrology, habitat, and/or documented occurrences, San Diego County viguiera (*Bahiopsis laciniata*), slender pod jewelflower (*Caulanthus heterophyllus*), and Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*) were determined to have a high potential to occur within the Project area. Specifically, these species have the potential to occur within Diegan coastal sage scrub. Impacts to San Diego County viguiera and Robinson's pepper-grass, California Rare Plant Rank 4.3 species, are not considered significant given that these species are relatively widespread and impacts to such species would not substantially reduce their populations. Slender pod jewelflower is a Target Species covered under the Poway Subarea Habitat Conservation Plan/Natural Communities Conservation Plan (Poway Subarea HCP) and is considered adequately protected under the Poway Subarea HCP based on the amount of preserved habitat within the Poway Mitigation Area. Therefore, as the Project would not result in impacts to highly ranked plant species and would not substantially decrease the regional populations of San Diego County viguiera, Slender pod jewelflower, or Robinson's pepper-grass, impacts to special-status plant species would be less than significant.

A single special-status animal species was observed during biological surveys of the Project area: western bluebird (*Sialia mexicana*). Nine additional special-status animal species were determined to have high potential to occur in the Project vicinity based on factors including the presence of suitable habitat, documented occurrences, appropriate soils, and/or known wintering and breeding ranges. The nine special-status animal species determined to have high potential to occur within the Project area include the following: Belding's orange-throated whiptail (*Aspidoscelis hyperythra beldingi*), San Diego tiger whiptail (*Aspidoscelis tigris stejnegeri*), red diamond rattlesnake (*Crotalus ruber*), Cooper's hawk

(*Accipiter cooperii*), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), coastal California gnatcatcher (*Polioptila californica californica*), yellow warbler (*Setophaga petechia*), least Bell's vireo (*Vireo bellii pusillus*), and western yellow bat (*Lasiurus xanthinus*). Potential impacts to each of these species and their habitats are described below.

Coastal California gnatcatcher is a federally listed threatened species and State of California Species of Special Concern. The Project proposes impacts to less than 0.1 acre of Diegan coastal sage scrub habitat with the potential to support coastal California gnatcatcher, though only 0.01 acre (440 SF) of permanent impacts would occur. Impacts to coastal California gnatcatcher would be significant if construction activities were to occur during the coastal California gnatcatcher breeding season (February 15 through August 15) and result in the direct removal of occupied coastal California gnatcatcher habitat or occur within 300 feet of occupied coastal California gnatcatcher habitat. The Project has the potential to result in both direct and indirect impacts to breeding/nesting coastal California gnatcatcher and impacts are considered potentially significant. Mitigation measure BIO-1 would require pre-construction protocol surveys for work occurring during the coastal California gnatcatcher breeding season and, if occupied habitat is identified, implementation of avoidance or noise-reduction measures. With implementation of mitigation measure BIO-1, impacts to breeding/nesting coastal California gnatcatcher would be less than significant.

Least Bell's vireo is a federally listed endangered species, state listed endangered species, and Poway Subarea HCP Target Species. The proposed Project would avoid impacts to riparian habitat near the Project site with the potential to support least Bell's vireo; therefore, no significant direct impact would occur. However, indirect impacts to least Bell's vireo would occur if construction activities were to take place within 300 feet of occupied least Bell's vireo habitat during the vireo breeding season (March 15 to September 15) and generate hourly average noise levels greater than 60 A-weighted decibels (dBA), or exceed ambient noise levels by three dBA where ambient noise levels exceed 60 dBA, at an active least Bell's vireo nest site. The Project has potential to result in construction activities exceeding these noise levels during the least Bell's vireo breeding season and indirect impacts to least Bell's vireo are considered potentially significant. Mitigation measure BIO-2 would require pre-construction protocol surveys for work occurring during the least Bell's vireo breeding season and, if nests are identified, implementation of avoidance or noise-reduction measures. With implementation of mitigation measure BIO-2, impacts to least Bell's vireo would be less than significant.

Belding's orange-throated whiptail (California Department of Fish and Wildlife [CDFW] Watch List and Poway Subarea HCP Target Species), San Diego tiger whiptail (CDFW Species of Special Concern), and red diamond rattlesnake (CDFW Species of Special Concern) have the potential to occur within Diegan coastal sage scrub habitat, less than 0.1 acre of which would be removed by the Project. However, habitat impacts for these species would be less than significant based on the small amount of habitat that would be permanently impacted, the few numbers of individuals that would be potentially affected, and adequate coverage of suitable habitat for these species under the Poway Subarea HCP, including adjacent preserved lands within the Blue Sky Ecological Reserve and Lake Poway Recreation Area.

Potential breeding habitat for Cooper's hawk (CDFW Watch List and Poway Subarea HCP Target Species), southern California rufous-crowned sparrow (CDFW Watch List and Poway Subarea HCP Target Species), western bluebird (Poway Subarea HCP Target Species), and yellow warbler (CDFW Species of Special Concern) was identified in the Project area and potentially significant impacts to these species may occur due to the trimming and/or removal of shrubs and trees. As a regulatory requirement, the proposed Project must comply with the regulations and guidelines of the Migratory Bird Treaty Act (MBTA) and

California Fish and Game Code (CFG Code). If construction activities cannot avoid the general bird nesting season (January 15 through July 31 for raptors; February 15 through August 15 for upland species, and March 15 through September 15 for riparian species), pre-construction nesting surveys and avoidance buffers of active nests would be required. Mitigation measure BIO-3 would ensure the appropriate pre-construction surveys and avoidance measures are completed to prevent direct impacts to nesting birds, including special-status avian species. As such, with implementation of mitigation measure BIO-3, impacts to Cooper's hawk, southern California rufous-crowned sparrow, western bluebird, and yellow warbler would be less than significant.

Potential roosting habitat for Western yellow bat was identified within the survey area as a stand of Mexican fan palm trees located along the unnamed drainage south of Lake Poway Road. The Project would avoid direct impacts to this area and would not result in the removal of suitable habitat for Western yellow bat. Therefore, no impact would occur.

In summary, the Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or the U.S. Fish and Wildlife Service with incorporation of identified mitigation measures. The Project would have less than significant impacts on special-status plant species due to the lack of threatened plant species located within the Project site. Project construction has the potential to result in significant impacts to nesting coastal California gnatcatcher, least Bell's vireo, and other birds protected under the MBTA and CFG Code. However, these impacts would be reduced to less than significant levels with implementation of mitigation measures BIO-1 through BIO-3 for the City-owned components and with adherence to the standard measures provided in Section 6.4 of the Water Authority's NCCP/HCP (Water Authority 2010) by the Water Authority for the POW-6 FCF component. Impacts to other special-status animal species would be less than significant due to the small quantities of habitat that would be removed by the Project. Impacts would be less than significant with implementation of the identified mitigation measures.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant with Mitigation Incorporated. As discussed above, a total of eight vegetation communities or land cover types occur within the approximately 28-acre biological survey area, which includes a buffer around proposed Project impact areas: southern willow scrub, disturbed wetland, Diegan coastal sage scrub (including disturbed phase), non-native grassland, non-native vegetation, eucalyptus woodland, disturbed habitat, and developed land. Those vegetation communities that would be impacted directly by the 3.2-acre Project impact area are detailed in Table 5, *Vegetation Communities/Land Cover Types and Impacts*, and shown in Figure 6, *Vegetation Communities/Impacts*.

Table 5
VEGETATION COMMUNITIES/LAND COVER TYPES AND IMPACTS

Vegetation Community/ Land Cover Type	Impacts (Acres[1])		
	Temporary	Permanent	Total
Wetlands			
Southern Willow Scrub	0	0	0
Disturbed Wetland	0	0	0
Wetlands Subtotal	*0*	*0*	*0*
Uplands			
Diegan Coastal Sage Scrub – including disturbed	<0.1 (3,450 SF)	<0.1 (440 SF)	**0.1**
Non-Native Grassland	<0.1 (296 SF)	0	**<0.1**
Non-Native Vegetation	0.1	0.1	**0.2**
Eucalyptus Woodland	0.1	<0.1 (735 SF)	**0.1**
Disturbed Habitat	0.2	<0.1 (1,350 SF)	**0.2**
Developed	2.0	0.6	**2.6**
Uplands Subtotal	**2.5**	**0.7**	**3.2**
TOTAL	**2.5**	**0.7**	**3.2**

Source: HELIX 2026b

[1] Upland habitats are rounded to the nearest 0.1 acre, while wetland habitats are rounded to the nearest 0.01; thus, total reflects rounding.

SF = square feet

As shown in Table 5, the Project would result in direct impacts to 3.2 acres of habitat/land cover types comprising 0.7 acre of permanent impacts and 2.5 acres of temporary impacts. Non-native vegetation, eucalyptus woodland, disturbed habitat, and developed lands do not meet the definition of sensitive habitat under CEQA and impacts to these vegetation communities are not considered significant. Sensitive vegetation communities and habitat types mapped during the biological survey include southern willow scrub, disturbed wetland, Diegan coastal sage scrub (including disturbed), and non-native grassland. Of these sensitive vegetation communities, only Diegan coastal sage scrub (including disturbed) would be impacted by the Project.

Temporary impacts to less than 0.1 acre (3,450 SF) of Diegan coastal sage scrub (including disturbed) would occur along Espola Road north of County Day Road and south of Lake Poway Road. Temporary impacts to this sensitive vegetation community are not considered significant. Permanent impacts to less than 0.01 acre (440 SF) of Diegan coastal sage scrub would occur and would be considered potentially significant. Mitigation measure BIO-4 would require habitat-based mitigation to be provided at the 2:1 ratio prescribed by the Poway Subarea HCP, resulting in approximately 0.02 acre of habitat mitigation required via payment into the City's Mitigation Area Acquisition Fund. With implementation of mitigation measure BIO-4, direct impact to Diegan coastal sage scrub would be less than significant.

Project construction would also occur adjacent to sensitive natural communities. While the Project components would avoid direct or permanent impacts to these areas, inadvertent intrusion by construction vehicles, equipment, and personnel could result in impacts to these sensitive natural communities, which would be considered potentially significant. Mitigation measures BIO-5 and BIO-6

Study Area
Permanent Impact
Temporary Impact
Staging Area
Culvert
Concrete Ditch
Stream

Vegetation Communities

Developed (12000)
Diegan Coastal Sage Scrub (32500)
Diegan Coastal Sage Scrub - disturbed (32500)
Disturbed Habitat (11300)
Disturbed Wetland (11200)
Eucalyptus Woodland (79100)
Non-native Grassland (42200)
Non-native Vegetation (11000)
Southern Willow Scrub (63320)

Espola Rd
Espola Rd
Twisted Branch Rd
Country Day Rd
Windpiper Rd
Morning Air Rd
Blue Ridge Trl
Lake Poway Rd
Trailwind Rd

I:\PROJECTS\K\KennedyJenksConsultants_00407\00035_PowayProgramMgmnt\Map\SMND\SMND.aprx Fig6_VegImps : 00407.35.1 : 3/18/2026 - SAB

0 300 Feet

Source: Aerial (Vantor, 2025)

HELIX Environmental Planning

Vegetation Communities/Impacts

Figure 6

would require construction fencing and biological monitoring to ensure the City's construction activities do not encroach into off-site sensitive habitat. For the POW-6 FCF component, the Water Authority would implement similar avoidance and minimization measures according to the standard measures in the Water Authority NCCP/HCP (see Section 2.5.2). With implementation of mitigation measures BIO-5 and BIO-6 and adherence to the Water Authority NCCP/HCP, inadvertent impacts to sensitive natural communities located immediately adjacent to construction work areas would be avoided and impacts would be less than significant.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less Than Significant with Mitigation Incorporated. The biological survey identified two potential jurisdictional aquatic resources within the survey area. The first consists of an unnamed drainage and associated southern coast live oak riparian forest habitat east of Espola Road and south of Green Valley Truck Trail. This drainage is tributary to Green Valley Creek, which flows in a northerly direction, where it eventually converges with the San Dieguito River. A second unnamed drainage and associated southern willow scrub and disturbed wetland habitat occurs to the south of Lake Poway Road. This drainage feature conveys runoff and stormflows and enters an underground culvert beneath a dirt access and hiking trail located south of Lake Poway Road.

The Project has been specifically designed to avoid impacts to federally protected wetlands and other potential jurisdictional aquatic resources by restricting Project components to upland areas. A portion of the Project's impact area south of Lake Poway Road occurs just north of the unnamed drainage that supports potential jurisdictional waters, wetland, and riparian habitat where the existing pump station would be demolished and a biofiltration catch basin and associated riprap outfall would be constructed. Though the Project impact footprint slightly overlaps the adjacent southern willow scrub, these impacts would occur within upland areas underneath the riparian canopy. Adjacent willow trees are rooted within the concrete-lined drainage to the south. Though overhanging branches and limbs would be trimmed, as needed, no willows or associated riparian habitat would be removed. Furthermore, no ground disturbance would occur to jurisdictional waters, wetlands, or streambed habitat. Therefore, the Project would avoid direct impacts to the jurisdictional areas, and no impact would occur.

Since Project construction would occur adjacent to potential jurisdictional resources, inadvertent intrusion into these adjacent areas by construction vehicles, equipment, and personnel could result in potentially significant impacts. As described above, mitigation measures BIO-5 and BIO-6 would require construction fencing and biological monitoring to avoid inadvertent off-site impacts. With implementation of mitigation measures BIO-5 and BIO-6 for the City-owned components as well as standard measures from the Water Authority NCCP/HCP for the POW-6 component, inadvertent impacts to potential jurisdictional resources located immediately adjacent to construction work areas would be avoided and impacts would be less than significant.

Potential indirect impacts on jurisdictional resources would also be prevented during construction through the successful implementation of standard BMPs required by the Project's SWPPP (refer to Section 2.5.5). Implementation of BMPs for erosion and sediment control (e.g., preservation of existing vegetation, mulching, hydroseeding, soil binding, silt fencing, fiber rolls, gravel bag berms, sweeping, sandbag barriers, storm drain inlet protection) and conformance with state Construction General Permit

requirements, where required, would address potential indirect impacts resulting from dust, hydrology modifications, and stormwater runoff. Indirect impacts would be less than significant.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. Wildlife corridors connect otherwise isolated pieces of habitat and allow the movement or dispersal of plants and animals. Local wildlife corridors allow access to resources such as food, water, and shelter within the framework of their daily routine. Regional corridors provide these functions over a larger scale and link two or more large habitat areas, allowing the dispersal of organisms and the consequent mixing of genes between populations. A corridor is a specific route that is used for the movement and migration of species and may be different from a linkage in that it represents a smaller or narrower avenue for movement. A linkage is an area of land that supports or contributes to the long-term movement of animals and genetic exchange by providing live-in habitat that connects to other habitat areas. Many linkages occur as stepping-stone linkages that are made up of a fragmented archipelago arrangement of habitat over a linear distance.

Regional movement corridors within the County have been identified in regional planning documents. The Project site does not occur within a designated Biological Resource Core Area (BRCA) or Biological Core and Linkage Area (BCLA) but is located approximately 450 feet east of the nearest Poway Subarea HCP BCLA boundary, which also correlates to the Central Poway/San Vicente Reservoir/North Poway BRCA, as designated in the San Diego Multiple Species Conservation Program. These areas contain high-value native habitats and riparian corridors, such as Green Valley Creek, which serve as local and regional wildlife movement corridors.

The Project site primarily consists of existing roadways and other developed and disturbed areas and is highly constrained by surrounding development. As such, it does not contain large swaths of native habitat, dense riparian areas, or significant aquatic resources and does not function as a local or regional wildlife linkage or movement corridor. Espola Road is a heavily traveled roadway that would create a barrier to east-west wildlife movement in the area. The Project site does not, by itself, function as or contribute to a local movement corridor, regional wildlife corridor, or connection point to other large areas of native habitat. Wildlife present in the region would be expected to utilize the higher quality habitat located to the east in association with Blue Sky Ecological Reserve and Lake Poway Recreation Area for live-in habitat and movement and dispersal activities. The Project would not result in direct impacts to the BCLA or BRCA. Adjacent construction activities may temporarily disrupt local wildlife in the area, but wildlife would be expected to move back into the area once construction activities have ceased. Therefore, the proposed Project would not substantially interfere with or constrain wildlife movement through the area and would not impede access to, or the use of, native wildlife nursery sites. As such, impacts would be less than significant.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The proposed Project would occur within City-owned property and public road ROWs. Article II of Poway Municipal Code Chapter 13.32, Urban Forestry, addresses planting, trimming, or removal of trees on public property or ROWs. As a regulatory requirement, a City issued tree removal permit would be required to be obtained prior to the removal of any trees within the Project footprint. Eucalyptus trees

removed by the Project are not anticipated to require replacement under a tree removal permit given their high fire hazard and potential to affect infrastructure with their root systems. Nonetheless, all terms and conditions of the tree removal permit would be adhered to, as applicable, including any requirements for the replacement of native trees (defined as coast live oak, canyon live oak, Engelmann oak, and California sycamore), if removed. As such, the Project would not conflict with local policies or ordinances protecting biological resources and no impact would occur.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less Than Significant with Mitigation Incorporated. The Project is proposed within the planning boundaries of the Poway Subarea HCP. The Poway Subarea HCP and associated Implementing Agreement allows the incidental take of threatened and endangered species, as well as regionally-sensitive species which are conserved by it. The Poway Subarea HCP was designed to be consistent with the goals, standards, and guidelines established in the subregional planning processes and with the recommended BRCAs and habitat linkages established by the County's Multiple Species Conservation Program, whose subregion includes the Poway Subarea HCP. Project consistency with the applicable Poway Subarea HCP provisions is discussed below.

Construction of POW-6 FCF would occur within the Water Authority's NCCP/HCP (Water Authority 2010) plan area. All activities would be carried out by the Water Authority and would therefore be implemented in compliance with the NCCP/HCP (see Section 2.5.2). The Water Authority would be responsible for ensuring design and construction of the POW-6 FCF is consistent with the NCCP/HCP.

City of Poway Subarea HCP

The Poway Subarea HCP designates regional preserves that are intended to be mostly void of development activities, while allowing the development of other areas subject to the requirements of the program. The Poway Subarea HCP identifies these areas as the "Poway Mitigation Area," which encompasses areas targeted for preservation and subject to special development requirements and management guidelines. The BCLA represents portions of the Poway Mitigation Area considered most essential to maintaining biological resource values, and, therefore, of highest priority for protection and management. The extreme northeastern portion of the biological survey area, east of Espola Road, is located within the Poway Mitigation Area but is located outside of a designated BCLA. The nearest BCLA boundary is located approximately 450 feet east of the biological survey area in the Blue Sky Ecological Reserve and Lake Poway Recreation Area. As the proposed Project would not occur within the Poway Mitigation Area, the land use guidelines and management practices are not applicable to the Project.

In addition, special development requirements and mitigation measures are included in Section 7.3 of the Poway HCP to minimize adverse impacts and mitigate for unavoidable impacts to sensitive habitats and species. The special development requirements are divided into general and specific requirements. The specific development requirements would not apply to the Project given its location outside of the Poway Mitigation Area. As the Project contains native vegetation but is outside the Poway Mitigation Area, the general development requirements apply to the Project. The Project is in conformance with the general development requirements applicable to the Project as detailed in Table 6, *Poway Subarea HCP Development Requirement Conformance Summary*.

Table 6
POWAY SUBAREA HCP DEVELOPMENT REQUIREMENT CONFORMANCE SUMMARY

Condition	Conformance Summary
Any proposed public or participating private development project or action that may affect or potentially affect biological resources in the City must be found to comply with the biological resource conservation goals, objectives, policies, strategies, development requirements, and mitigation requirements of the Poway Subarea HCP.	The proposed Project conforms with the Poway Subarea HCP, as demonstrated throughout this analysis.
The major natural streams and tributary drainages that traverse the City shall be maintained in their natural state to enhance the movement of wildlife and to provide biological corridors between natural open space areas. The cleaning (debris removal) of these floodways and channels for flood control purposes shall be sensitive to the biological resource conservation value of the natural watercourse.	The proposed Project would not result in impacts to natural streams or tributary drainages.
The siting, construction, and maintenance of rural walkways pathways trail networks, and other linear type projects such as roadways and utility corridors shall be compatible with the conservation value and function of surrounding natural habitat and the important biological resource core and linkage areas identified in the Poway Subarea HCP.	The proposed Project consists of the construction of new pipelines and other associated water infrastructure. The Project would primarily occur within the existing roadways of Espola Road and Lake Poway Road and has been designed to limit disturbance to native vegetation. The Project would not result in impacts to lands designated as BCLAs.
The potential adverse effects of development and associated human activity (for example noise, light, and encroachment by people or domestic animals) on adjacent open space, natural habitat, biological core areas, habitat linkages, and wildlife movement corridors shall be limited as deemed necessary to preserve the integrity of these areas. In some cases, a buffer of protected natural habitat surrounding the development area may be required.	Temporary noise generated during the implementation of construction activities that require the use of heavy equipment could adversely and temporarily impact local wildlife potentially present within the adjacent open space area located east of Espola Road (e.g., Blue Sky Ecological Reserve). Wildlife may temporarily avoid portions of the adjacent open space area, but the work is not expected to interfere with the overall use of the open space area based on the temporary nature of construction activities and the Project footprint being confined to Espola Road. As such, the Project would not result in an adverse noise impact on wildlife use of adjacent open space areas. Nighttime construction activities requiring lighting would be required to use the lowest illumination that would help to ensure the safety of construction personnel and security of the site and would be shielded and directed away from adjacent habitat areas. Lighting required for vault access would be used on an as-needed basis during maintenance. Permanent exterior lighting at the pump station building would be shielded away from habitat.

Condition	Conformance Summary
The City's Grading Ordinance regulations and permit requirements for clearing and grubbing shall apply to all biological archaeological and historical resources found in the City.	The proposed Project would conform with all applicable regulations of the City's Grading Ordinance. All required permits would be obtained prior to the initiation of construction activities and the Project would adhere to all permit requirements and conditions.
The use of rip-rap in stream channels shall minimize adverse impacts to sensitive biological resources and shall be limited to the minimum area required to protect adjacent improvements and stream banks from excessive erosion.	The Project does not propose the use of rip-rap within any stream channels.
Important and sensitive biological resources, significant archaeological resources, and historical sites shall be protected and integrated into the design of a development project where feasible.	The Project would primarily occur within the existing roadways of Espola Road and Lake Poway Road and has been designed to limit disturbance to native vegetation. The Project would not result in impacts to lands designated as BCLAs.
Individual specimens of trees considered locally sensitive, including coast live oak, holly oak, California sycamore, and mature eucalyptus, shall not be removed without the necessary approvals by the City.	A tree removal permit would be obtained prior to the removal of any locally sensitive tree species in accordance with the City's Urban Forest Ordinance.
Mitigation for significant impacts to biological resources shall be in accordance with the mitigation requirements of the Poway Subarea HCP.	The proposed Project would result in direct impacts to sensitive vegetation communities comprised of less than 0.1 acre of Diegan coastal sage scrub located outside of the Poway Mitigation Area. As detailed in mitigation measure BIO-4, the City proposes compensatory mitigation at a minimum 2:1 ratio through payment into the City's Mitigation Area Acquisition Fund.
Monitoring by a qualified biologist during vegetation clearing, grading, construction, and land development activities shall be required where there is the potential to impact sensitive biological resources both on and offsite.	Implementation of mitigation measure BIO-6, which requires biological monitoring, would ensure conformance with this policy.

Source: HELIX 2026b

In addition to conformance with the general requirements above, the Poway Subarea HCP requires habitat-based mitigation for impacts to sensitive vegetation communities located either inside or outside of the Poway Mitigation Area. Compensatory mitigation may include the (1) purchase or dedication of lands inside the Poway Mitigation Area as biological open space, or (2) payment in lieu of fees into a mitigation bank administered by the City or a land trust acting as an agent of the City. The Project would result in direct impacts to sensitive vegetation communities comprised of less than 0.1 acre of Diegan coastal sage scrub located outside of the Poway Mitigation Area. The City proposes compensatory mitigation at a minimum 2:1 ratio through payment into the City's Mitigation Area Acquisition Fund, which is in conformance with the requirements of the Poway Subarea HCP and implementing policies. As described in Table 6, the Project would comply with the Poway Subarea HCP requirements with implementation of mitigation measures BIO-4 and BIO-6.

Conclusion

As described throughout this response, implementation of the mitigation measures previously identified for special-status species and habitat impacts would also ensure compliance with the Poway Subarea HCP. With adherence to these conditions and mitigation measures, the Project would not conflict with the applicable Habitat Conservation Plan or Natural Community Conservation Plan and impacts would be less than significant.

Mitigation

Potential impacts associated with coastal California gnatcatcher, least Bell's vireo, and other nesting birds would be reduced to less than significant levels with implementation of mitigation measures BIO-1 through BIO-3. Mitigation measure BIO-4 would reduce potentially significant direct impacts to Diegan coastal sage scrub to a less than significant level. Potentially significant direct and indirect impacts to sensitive natural communities and jurisdictional waters and wetlands located outside of the Project impact area would be avoided with implementation of the mitigation measures BIO-5 and BIO-6. The following mitigation measures apply to the City and/or their designated contractors while the Water Authority would implement standard minimization measures in accordance with the NCCP/HCP.

BIO-1 Coastal California Gnatcatcher Avoidance. Grading or clearing of vegetation within 300 feet of suitable coastal California gnatcatcher habitat during the gnatcatcher breeding season (February 15 through August 15) shall be avoided to the extent feasible. If clearing or grading would occur within 300 feet of suitable gnatcatcher habitat during the gnatcatcher breeding season, the following measures shall be implemented:

a. A Qualified Biologist (possessing a valid Endangered Species Act Section 10[a][1][A] Recovery Permit) shall conduct protocol surveys for coastal California gnatcatcher to determine whether gnatcatchers occur within 300 feet of the proposed work area(s). If no gnatcatchers are detected, grading and clearing shall be allowed to proceed. If protocol surveys are not conducted, gnatcatchers shall be presumed to be present, and the measures below shall be implemented.

b. If gnatcatchers are detected, the Qualified Biologist will determine whether gnatcatchers are nesting within 300 feet of the proposed work area(s). If any gnatcatchers are observed nesting or displaying breeding/nesting behavior during the surveys, construction shall be postponed within 300 feet of any location at which gnatcatchers have been observed until a Qualified Biologist has determined that all nesting (or breeding/nesting behavior) has ceased or until after August 15.

c. If construction activities within 300 feet of an active gnatcatcher nest location cannot be avoided, noise levels at the nest site shall be restricted to less than 60 dBA, or the ambient noise levels plus 3 dBA (perceptible change threshold), whichever is greater. Noise attenuation measures (e.g., noise walls, sound blankets, etc.) shall be implemented as determined necessary by a Qualified Noise Specialist and/or Biologist, to ensure that noise levels do not exceed the restricted threshold.

BIO-2 **Least Bell's Vireo Avoidance.** Grading or clearing of vegetation within 300 feet of suitable least Bell's vireo habitat during the vireo breeding season (March 15 through September 15) shall be avoided to the extent feasible. If clearing or grading would occur within 300 feet of suitable vireo habitat during the vireo breeding season, the following measures shall be implemented:

a. A Qualified Biologist shall conduct protocol surveys for least Bell's vireo to determine whether vireos occur within 300 feet of the proposed work area(s). If no vireos are detected, grading and clearing shall be allowed to proceed. If protocol surveys are not conducted, vireos shall be presumed to be present, and the measures below shall be implemented.

b. If vireos are detected, the Qualified Biologist will determine whether vireos are nesting within 300 feet of the proposed work area(s). If any vireos are observed nesting or displaying breeding/nesting behavior during the surveys, construction shall be postponed within 300 feet of any location at which vireos have been observed until a Qualified Biologist has determined that all nesting (or breeding/nesting behavior) has ceased or until after September 15.

c. If construction activities within 300 feet of an active vireo nest location cannot be avoided, noise levels at the nest site shall be restricted to less than 60 dBA, or the ambient noise levels plus 3 dBA (perceptible change threshold), whichever is greater. Noise attenuation measures (e.g., noise walls, sound blankets, etc.) shall be implemented, as determined necessary by a Qualified Noise Specialist and/or Biologist, to ensure that noise levels do not exceed the restricted threshold.

BIO-3 **Nesting Bird Avoidance**. Grubbing or clearing of vegetation during the general bird nesting season (January 15 through July 31 for raptors; February 15 through August 15 for upland species, and March 15 through September 15 for riparian species), will be avoided to the extent feasible. If grubbing, clearing, or grading is to occur during the bird nesting season, a pre-construction survey shall be conducted by a Qualified Biologist no more than five days prior to the commencement of the activities in areas supporting suitable habitat, to determine the presence or absence of nesting birds or raptors within the proposed area of disturbance. If it is determined at the completion of the pre-construction survey(s) that active nests are absent from the proposed area of disturbance, activities shall be allowed to proceed. If an active bird or raptor nest is confirmed to be present during the pre-construction survey, a nest avoidance buffer shall be established by the Qualified Biologist. Nest avoidance buffers shall be implemented as determined by conditions in the City of Poway Subarea Habitat Conservation Plan/Natural Communities Conservation Plan, as applicable, or by the Qualified Biologist/Environmental Surveyor if no defined buffer is specified. Construction activities shall avoid any active nests until a Qualified Biologist has verified that the young have fledged, or the nest has otherwise become inactive.

BIO-4 **Habitat-Based Mitigation.** Direct permanent impacts to 0.01 acre (440 SF) of Diegan coastal sage scrub (including disturbed) habitat outside of the Poway Mitigation Area shall be mitigated at a minimum 2:1 ratio in accordance with ratios provided in Section 7.4.3 of the Poway Subarea Habitat Conservation Plan/Natural Communities Conservation Plan for anticipated mitigation obligation of 0.02 acre. Mitigation shall consist of payment into the City of Poway's Mitigation Area Acquisition Fund.

BIO-5 Temporary Construction Fencing. Prior to construction, to help ensure inadvertent impacts to environmentally sensitive areas outside of the approved impact footprint are avoided, temporary construction fencing, including silt fencing, as appropriate and where determined necessary by the SWPPP, shall be installed at the edges of the approved impact limits. Temporary fencing shall be installed at all locations where the Project components occur adjacent to riparian habitat, sensitive natural communities, and aquatic resources, including jurisdictional waters or wetlands. A Qualified Biologist shall monitor the installation of the temporary construction fencing wherever it would abut environmentally sensitive areas. Construction activities shall be restricted to areas within the approved impact limits at all times during construction.

BIO-6 Biological Monitoring. A Qualified Biologist shall conduct a pre-construction environmental training session for construction personnel to inform them of the sensitive biological resources in the local area and the avoidance measures in place to remain in compliance with Project approvals and environmental permits and regulations. The biologist shall monitor all vegetation clearing and grubbing activities and monitor construction activities on a regular basis in the nest avoidance buffer (if established) and where temporary construction fencing has been installed adjacent to environmentally sensitive areas. The biologist shall have the authority to temporarily halt construction activities and make recommendations to help ensure impact minimization, compliance with the relevant provisions of all environmental permits and regulations, and that work does not take place in environmentally sensitive areas outside of approved work areas.

4.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

The discussion below is based on the Cultural Resources Technical Report prepared by HELIX Environmental Planning, Inc. (HELIX 2026c), attached to this Initial Study as Appendix C. The Cultural Resources Survey included a records search, Sacred Lands File search, Native American outreach, a review of historic aerial photographs and maps, and a pedestrian survey.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. HELIX obtained a records search of the Project area and a one-mile buffer from the South Coastal Information Center (SCIC) on January 30, 2023. A review of the California Historical Resources and the state Office of Historic Preservation historic properties directories was also conducted.

The records search and state directory searches did not identify any potentially historical resources. The only existing facility component proposed for demolition with the Project is an existing pump station, which is not considered a historic resource. As no historic built environment resources or historic properties have been identified for demolition as a result of the Project, no impacts to historical resources would occur.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant with Mitigation Incorporated. The SCIC records search discussed in item 4.5.a, identified a total of 36 previously recorded cultural resources within a one-mile radius of the Project area. Of these 36 resources, nine were documented within 1,000 feet of the Project area; however, none of the recorded cultural resources were identified within the proposed Project impact area. Eight of the nearby cultural resources were precontact sites while one resource was unknown. There were no additional cultural resources identified during pedestrian surveys of the Project area.

While there are no known archaeological resources present that would be impacted by the proposed Project, the Project area is considered culturally sensitive given documentation of nearby cultural resources and its location within alluvial soils where there is a potential for undocumented, buried cultural resources to occur. In addition, Espola Road and Lake Poway Road were constructed prior to requirements related to cultural resource studies; therefore, the presence of subsurface resources within these roadways is unknown. Based on the cultural sensitivity of the Project area, impacts to archaeological resources are considered potentially significant.

An archaeological and Native American monitoring program was recommended in the Project's Cultural Resources Technical Report and is detailed mitigation measure CUL-1. The monitoring program would include attendance by a qualified Project archaeologist and Native American monitor at a pre-construction meeting and during all initial ground-disturbing activities (including brushing/grubbing, grading, excavation, trenching, etc.). As stated in mitigation measure CUL-1, the archaeological monitor, in conjunction with the Native American monitor, may determine that monitoring is no longer warranted within particular sections of the proposed Project impact area based on the developed nature of the Project site. With implementation of mitigation measure CUL-1, impacts to archaeological resources would be less than significant.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact. The Project site is not located within or near a formal cemetery and is not known to be located on a burial ground. Since the Project site is primarily developed, it is unlikely the Project would disturb human remains during construction. Should human remains be uncovered during construction, the Project would comply with existing regulations, including California Health and Safety Code Section 7050.5, and the remains would be protected, analyzed, and preserved as required. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the NAHC, would be contacted in order to determine proper treatment and disposition of the remains in accordance with California Public Resources Code Section 5097.98. Therefore, impacts to human remains would be less than significant.

Mitigation

Implementation of mitigation measure CUL-1 would reduce potential impacts to archaeological resources to a less than significant level.

CUL-1 Archaeological and Native American Construction Monitoring Program. An archaeological resources monitoring program shall be implemented during Project construction and include the following:

1. Prior to issuance of a Right-of-Way Permit, encroachment permit, or grading permit, a qualified archaeologist (Project archaeologist) shall be retained by the City to implement the monitoring program.

2. The Project archaeologist shall attend a pre-construction meeting with the contractors to explain and coordinate the requirements of the monitoring program.

3. The Project archaeologist shall direct the archaeological field monitor during all initial ground-disturbing activities, including brushing/grubbing, grading, excavation, trenching, etc.

4. Native American monitoring shall be required during initial ground-disturbing activities, unless the Project archaeologist and Native American monitor determine that the potential for cultural resources has been exhausted. The Native American monitor(s) will be directed by the Project archaeologist.

5. During initial ground-disturbing activities that disturb native soils, the archaeological monitor and Native American representative(s) shall be on site, as determined by the Project archaeologist, to perform inspections of the excavations. Full- or part-time inspections may be needed depending upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. Because the majority of the Project is in previously disturbed soil, the Project archaeologist, in conjunction with the Native American monitor(s), may determine that monitoring is no longer warranted due to the presence of modern fill or formational soils with no potential for cultural resources. The City shall be informed about such a determination and shall make the final determination on the necessity for additional monitoring.

6. Isolates and clearly non-significant deposits shall be minimally documented in the field and reburied on-site in an agreed upon location by the traditionally and culturally affiliated (TCA) Tribe, the Project archaeologist, and the archaeological and Native American monitors. After documentation and collection, the monitored ground-disturbing activities can proceed.

7. In the event that previously unidentified cultural resources are discovered, the archaeological and Native American monitors shall have the authority to divert or temporarily halt ground-disturbance activities in the area of discovery to allow for the evaluation of potentially significant cultural resources. The archaeological field monitor or Project archaeologist shall contact the City at the time of discovery. The Project archaeologist, in consultation with the City, shall determine the significance of the discovered resources. The City must concur with the evaluation and all treatment and

mitigation activities must be completed before construction activities are allowed to resume in the affected area. If avoidance and preservation of significant cultural resources is infeasible, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the Project archaeologist and approved by the City before being carried out using professional archaeological methods.

8. If any human remains are discovered, all ground-disturbing activities at that location shall stop and the County of San Diego Coroner's office and City shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains.

9. Before construction activities are allowed to resume in the location of any discovered significant cultural deposits, the artifacts shall be recovered and features recorded using professional archaeological methods. The archaeological monitor(s) shall determine the amount of material to be recovered for an adequate artifact sample for analysis.

10. At the completion of the monitoring program, including the completion of any data recovery program activities, any tribal cultural resources collected by the qualified archaeologist shall be repatriated to the Native American monitor(s)/representative(s) for respectful and dignified treatment in accordance with the TCA Tribe's cultural and spiritual traditions, which may include reburial within the Project location. Should the TCA Tribe or other traditionally and culturally affiliated tribe decline the collection, the collection shall be curated at the San Diego Archaeological Center. All other significant cultural resources determined by the qualified archaeologist, in consultation with the Native American monitor, to not be tribal cultural resources, shall be curated at the San Diego Archaeological Center.

11. A report shall be completed at the completion of the Project construction describing the methods and results of the monitoring program and shall include California Department of Parks and Recreation Primary and Archaeological Site Forms for any newly discovered resources. If a Research Design and Data Recovery Program has been implemented for the treatment and mitigation of significant cultural resources, the report shall also include the field and analysis results and interpretation of the artifact and research data within the research context and design. The report shall be completed and submitted to the satisfaction of the City.

4.6 Energy

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

The discussion below is based on the Air Quality, Greenhouse Gas Emissions, and Energy Assessment prepared by HELIX (2026a), attached to this Initial Study as Appendix A.

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. The Project would require new energy resources during both construction and operation. Construction fuel consumption factors for Project equipment were calculated using data from the California Air Resources Board Mobile Source Emissions Inventory online databases–OFFROAD2026 version 1.1.2 and EMFAC2025 version 2.0.0 (HELIX 2026a). Energy use during construction typically involves the use of motor vehicles for transportation of workers and materials and the use of motorized equipment for direct construction actions such as moving soil and demolishing structures. The estimated combined construction energy that would be used during construction activities is shown in Table 7, *Construction Energy Use*. As shown in Table 7, total Project construction activities would result in the consumption of approximately 11,834 gallons of diesel fuel and approximately 14,092 gallons of gasoline. The total construction energy use would be approximately 3,392 million British thermal units.

Table 7
CONSTRUCTION ENERGY USE

Source	Diesel (gallons)	Gasoline (gallons)	Total Energy (MMBTU)
Off-Road Construction Vehicles	3,875	-	539
On-Road Construction Vehicles	7,959	14,092	2,854
TOTAL[1]	11,834	14,092	3,392

Source: HELIX 2026a
[1] Totals may not sum due to rounding.
MMBTU = million British thermal units

Construction activities are not anticipated to result in an inefficient use of energy. Since the use of gasoline and diesel fuel would be a significant portion of construction costs, contractors and equipment operators would minimize the use of fuel within the constraints of program requirements. Construction equipment would be maintained in optimal working order and rated energy efficient and on-site vehicle idling would be minimized to reduce the use of gasoline and diesel. Due to the short-term nature of the

construction activities and the total amount of diesel and gasoline fuel anticipated to be consumed, the Project's consumption of energy (primarily diesel fuel) during construction would not represent a substantial demand on energy resources or result in the need to develop any new, or alter any existing, energy production or distribution facilities. In addition, construction-related energy would not be used in a wasteful, inefficient, or unnecessary manner.

Energy use associated with Project operation would result from increased electricity use and backup emergency generator testing. Assuming continuous operation of the pump station at an average pumping rate (two 125-horsepower pumps operating), the Project is anticipated to consume 2.2 megawatt-hours of electricity per year. Based on the anticipated generator testing schedule, the generator would consume less than 1 gallon of diesel fuel per year. The overall intent of the Project is to provide a treated water source to allow greater flexibility for the City to perform typical repair and replacement work within the Berglund WTP in the future. Long-term operation of the Project would be similar to existing conditions and energy use would be limited to the operations necessary for the pumping of water. Therefore, the Project would not consume energy in a wasteful, inefficient, or unnecessary manner, and impacts would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. As described above, the Project would provide a treated water source to the City and allow repair and replacement work within the Berglund WTP in the future. Long-term operation of the Project would be similar to existing conditions and energy use would be limited to the operations necessary for the pumping of water. By improving the existing water infrastructure, the Project would reduce reliance on imported water. The Project's demand for energy resources and services would not be anticipated to require the construction of new energy generation facilities or require improvements to local infrastructure. Therefore, impacts related to inconsistency with adopted plans and policies would be less than significant.

4.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	iv. Landslides?	☐	☐	☐	☒
b)	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Ninyo & Moore prepared a Geotechnical Evaluation for the Project, which is summarized below and attached to this IS/MND as Appendix D (Ninyo & Moore 2022a).

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?

No Impact. The purpose of the Alquist-Priolo Earthquake Zoning Act is to prohibit the placement of most structures for human occupancy across the traces of active faults; thereby mitigating the hazard of fault ruptures. The Project site is not located within a mapped Alquist-Priolo Earthquake Fault Zone and the nearest active fault is approximately 16.5 miles west of the site (Ninyo & Moore 2022a). Therefore, rupture of a known earthquake fault is not anticipated to occur at the surface of the Project site and no impact would occur.

ii. Strong seismic ground shaking?

Less Than Significant Impact. Based on the presence of active faults in the Project region, there is potential for strong ground shaking to occur at the site. The geotechnical evaluation prepared for the Project provides recommendations for Project construction in accordance with applicable regulatory requirements for site-specific geologic characteristics, including potential peak ground acceleration (Ninyo & Moore 2022a). Compliance with these recommendations, which would be required by the City and state building codes, would prevent substantial hazards in the event of strong seismic ground shaking at the site. Impacts would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

No Impact. Seismic ground shaking of relatively loose, granular soils that are saturated or submerged can cause underlying soils to liquefy and temporarily behave as a dense fluid. The geotechnical evaluation concluded that due to the dense granitic bedrock that underlies the Project site and lack of shallow groundwater, liquefaction is not a potential hazard for the Project (Ninyo & Moore 2022a). No impact would occur.

iv. Landslides?

No Impact. Landslides, slope failures, and mudflows of earth materials generally occur where slopes are steep and/or the earth materials are too weak to support themselves. Based on the relatively level topography of the site and lack of historical landslides at the site, landslides or slope failure within the Project site are not considered substantial risks (Ninyo & Moore 2022a). No impact would occur.

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Implementation of the proposed Project would increase the potential for erosion during construction due to the removal of stabilizing surfaces, excavation, and backfill. However, at the conclusion of construction, these surfaces would be restabilized, new construction areas would be stabilized, and there would be no change to erosion potential in the Project area.

Short-term erosion and sedimentation impacts would be addressed through conformance with applicable elements of the NPDES Construction General Permit and related City requirements, including the City grading and water quality ordinances. Specifically, this would include implementing an approved SWPPP, which would include BMPs for Project construction. Project-specific BMPs would be determined during the SWPPP process based on site-specific characteristics but may include erosion control measures such as geotextiles, mats, fiber rolls, or soil binders; sediment controls such as silt fencing, fiber rolls, gravel bags, or other methods; compliance with dust control measures; and preparation and implementation of a Rain Event Action Plan. Other BMPs may be added during the SWPPP process to ensure the Project complies with applicable regulations. Based on implementation of appropriate erosion and sediment control BMPs as part of, and in conformance with, the Project SWPPP, potential erosion impacts from the Project would be less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

No Impact. As discussed in response to items 4.7.a.iii and iv, the Project site is not anticipated to be susceptible to liquefaction or landslides. The geotechnical evaluation also concluded that settlement is not a hazard for the Project (Ninyo & Moore 2022a). As such, lateral spreading and subsidence are also not anticipated to pose risks to the Project. Based on the lack of potential for the aforementioned geologic hazards, the Project site is not anticipated to experience collapse. As discussed above, site-specific design recommendations would be incorporated into the Project to meet the criteria set forth in the applicable building codes. The Project site is not located on an unstable geologic unit and would not cause the site to become unstable. No impact would occur.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

No Impact. Soil testing conducted for the geotechnical evaluation revealed that the soils underlying the Project site have very low (expansion index less than 20) expansion potential (Ninyo & Moore 2022a). Therefore, soil expansion would not result in a direct or indirect risk to life or property for the Project and no impact would occur.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project does not propose the installation of septic tanks or alternative wastewater disposal systems. No impact would occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant with Mitigation Incorporated. According to the Project's geotechnical evaluation, the Project site is underlain by artificial fills, Holocene to late Pleistocene age young colluvial deposits, late to middle Pleistocene age old alluvium deposits, and Cretaceous age granitic rock (Ninyo & Moore 2022a). The potential for these geologic units to contain paleontological resources was assessed based on guidelines developed by the County (County 2009). Young colluvial deposits are not anticipated to contain paleontological resources based on their age and granitic rocks do not have potential to contain paleontological resources given their formation process. Therefore, no impacts to paleontological resources are anticipated during Project activities occurring where young colluvial deposits and granitic rock are mapped.

Old alluvium deposits have moderate to high potential to contain paleontological resources (County 2009). Older alluvium deposits are mapped in a small portion of the Project area, near the intersection of Espola Road and Lake Poway Road, where trenching for installation of the City's treated water pipeline is proposed. Excavation in old alluvium deposits has the potential to result in significant impacts to paleontological resources. Mitigation measure GEO-1 would require implementation of paleontological monitoring during excavation into mapped Pleistocene age old alluvium deposits. With implementation of this mitigation measure, impacts to paleontological resources would be less than significant.

Mitigation

The following mitigation measure would apply to the City and/or their designated contractors as the Water Authority component of the Project (POW-6 FCF) does not occur in the area where Pleistocene age old alluvium deposits were mapped. Implementation of mitigation measure GEO-1 would reduce potential impacts to paleontological resources to a less than significant level.

GEO-1 Paleontological Monitoring. Prior to commencement of Project construction, a Qualified Paleontologist shall be retained by the City to attend the Project pre-construction meeting and discuss proposed grading plans with the Project contractor(s). If the Qualified Paleontologist determines that proposed grading/excavation activities would likely affect previously undisturbed areas of Pleistocene-age alluvial deposits as a result of cuts into native soils, then monitoring shall be conducted as outlined below.

1. A Qualified Paleontologist or a Qualified Paleontological Monitor under the direction and supervision of a Qualified Paleontologist, shall be on site during original cutting of Pleistocene-age alluvial deposits. Monitoring of the noted geologic unit shall be conducted at least half-time at the beginning of excavation and may be either increased

or decreased thereafter depending upon initial results (per direction of a Qualified Paleontologist). Qualified Paleontologist and Qualified Paleontological Monitor are defined as follows:

a. Qualified Paleontologist: A Qualified Paleontologist is a person who has a Ph.D. or M.S. or equivalent in paleontology or closely related field (e.g., sedimentary or stratigraphic geology, evolutionary biology); has a demonstrated knowledge of Southern California paleontology and geology; and has documented experience performing professional paleontological procedures and techniques.

b. Qualified Paleontological Monitor: A Qualified Paleontological Monitor is defined as an individual with at least one year of experience in field identification and collecting of fossil materials.

2. Monitoring of the noted geologic unit shall be conducted at least half-time at the beginning of the excavation and may be either increased or decreased thereafter by the Qualified Paleontologist depending upon initial results of monitoring.

3. In the event that well-preserved fossils are discovered, the Qualified Paleontologist shall have the authority to temporarily halt or redirect construction activities in the discovery area to allow recovery in a timely manner (typically on the order of one hour to two days). All collected fossil remains shall be cleaned, sorted, cataloged, and deposited in an appropriate scientific institution (such as the San Diego Natural History Museum) at the expense of the City.

4. A report (with a map showing fossil site locations) summarizing the results, analyses, and conclusions of the above-described monitoring/recovery program shall be filed with the City of Poway Planning Division within three months of terminating monitoring activities.

4.8 Greenhouse Gas Emissions

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The discussion below is based on the Air Quality, Greenhouse Gas Emissions, and Energy Assessment prepared by HELIX (2026a), attached to this Initial Study as Appendix A.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. The SDAPCD and City do not have adopted greenhouse gas (GHG) emission thresholds. Prior to 2020, a screening level of 900 metric tons (MT) of carbon dioxide equivalent (CO_2e) per year was established by CAPCOA to determine whether further analysis would be needed to examine the GHG impacts of a project (CAPCOA 2008). This screening threshold was developed with the goal in mind of achieving the reductions described by AB 32 for meeting 1990 levels of statewide GHG emissions by the year 2020. Subsequently, Senate Bill (SB) 32 set a further statewide GHG emission reduction target of 40 percent below 1990 levels by 2030. A regression trajectory can be projected by reducing the operational year emissions goal from the 900 MT CO_2e target in 2020 to the 540 MT CO_2e target in 2030, resulting in a screening threshold of 540 MT CO_2e for the Project's operational year of 2030. While not an adopted threshold, this screening threshold is intended to disclose quantitative information and put the Project generated GHG emissions in the appropriate statewide context and consider the Project's potential impacts.

Neither the SDAPCD nor the City have adopted thresholds for determining the significance of a Project's temporary construction GHG emissions. To be conservative in accounting for all the Project's GHG emissions, the construction period emissions were amortized (i.e., averaged) over the anticipated 30-year lifespan of the Project and added to the Project's operational emissions.

Construction of the Project would result in GHG emissions generated by vehicle engine exhaust from construction equipment and worker commuting trips. Construction GHG emissions were calculated using CalEEMod and estimated to total approximately 2,072.1 MT CO_2e. Averaged over 30 years, construction activities would contribute approximately 69.1 MT CO_2e emissions per year.

Project operation would generate GHGs from testing of the emergency generator and use of electricity generated off-site. Table 8, *Total Estimated Operational GHG Emissions*, shows the calculated annual operational emissions combined with the amortized construction emissions for the Project. The total annual emissions are compared with the CAPCOA threshold for 2030.

Table 8
TOTAL ESTIMATED OPERATIONAL GHG EMISSIONS

Emission Sources	Operational Emissions (MT CO_2e)
Emergency Generator	3.7
Energy	0.2
Subtotal[1]	**3.9**
Amortized Construction Emissions	69.1
Total	**72.9**
CAPCOA 2030 Threshold	*540*
Exceed Threshold?	**No**

Source: HELIX 2026a
[1] Total may not sum due to rounding.
GHG = greenhouse gas; MT = metric tons; CO_2e = carbon dioxide equivalent;
CAPCOA = California Air Pollution Control Officers Association

As shown in Table 8, the Project's total annual operational emissions would not exceed the adjusted CAPCOA threshold. Therefore, the implementation of the Project would not generate GHG emissions,

either directly or indirectly, that may have a significant impact on the environment, and impacts would be less than significant.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. There are numerous state plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall state plan and policy is AB 32, the California Global Warming Solutions Act of 2006. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. SB 32 would require further reductions of 40 percent below 1990 levels by 2030. AB 1297 would require additional reduction to 85 percent below 1990 levels by 2045. Because the Project's operational year is post-2020, the Project aims to reach the quantitative goals set by SB 32 and AB 1297. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the low carbon fuel standard, and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the statewide level; as such, compliance at the project level is not addressed. Therefore, the proposed Project would not conflict with those plans and regulations.

The overall intent of the Project is to provide a treated water source to allow greater flexibility for the City to perform typical repair and replacement work within the Berglund WTP in the future. Long-term operation of the Project would be similar to existing conditions and would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, impacts would be less than significant.

4.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Ninyo & Moore prepared a Phase I Environmental Site Assessment (ESA) for the existing pump station site, which is summarized below as applicable and attached to this IS/MND as Appendix E (Ninyo & Moore 2022b).

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Construction activities are anticipated to require the transport, use, and disposal of materials such as diesel fuels, hydraulic liquids, oils, solvents, and paints. Similar materials would be required for maintenance of Project facilities once operational. The transport, use, and disposal of such hazardous materials is regulated by federal, state, and local agencies and regulations, such as the U.S. Environmental Protection Agency Resource Conservation and Recovery Act of 1976, the U.S. Department of Transportation Hazardous Materials Regulations, and the County Hazardous Materials Division's regulations. Adherence to such regulations would prevent hazards to the public and environment during construction and maintenance activities. Impacts would be less than significant.

The water treatment process is designed to minimize hazards and provide safe drinking water. To achieve state standards for drinking water, the Berglund WTP uses various chemicals including sodium hypochlorite and ammonia to treat water. An existing hazardous materials permit allows the use of similar chemicals at the Berglund WTP site and the improvements proposed by the Project would not trigger the need for additional permitting. Continued adherence to the conditions of the hazardous materials permit for the Berglund WTP with implementation of the sodium hypochlorite facility and other Project improvements would ensure no significant hazard to the public or the environment would occur due to the routine transport, use, or disposal of hazardous materials used in the water treatment process. Impacts would be less than significant.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant with Mitigation Incorporated. As discussed above in response to item 4.9.a, hazardous materials would be used during construction and maintenance; however, these materials would be used and stored in accordance with applicable regulations that would limit the potential for

accidental release. The Phase I ESA prepared for the existing pump station site identified the presence of asbestos-containing materials within gaskets associated with the pump station piping and caulking from the base of the transformer. Therefore, demolition of the pump station has the potential to release asbestos-containing materials into the environment, resulting in a potentially significant impact. Mitigation measure HAZ-1 would require a licensed asbestos abatement contractor to conduct demolition activities involving removal of the asbestos-containing materials in accordance with federal, state, and local regulations. With implementation of mitigation measure HAZ-1, construction period impacts would be less than significant.

Operation of the Project would involve the use of chemicals during the treatment process, as permitted by the existing hazardous material permit for the Berglund WTP. Hazardous materials used in this process are stored in accordance with applicable regulations and permit conditions designed to prevent potential accident conditions. Continued adherence to these regulations with implementation of the Project would prevent the potential for release of hazardous materials that would create a significant hazard to the public or the environment. Impacts during operation would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. There are no schools within one-quarter mile of the Project components. The nearest school to the Project site is Poway High School, located approximately 0.4 mile south of the Berglund WTP and the southernmost portion of the proposed pipeline. The Project would not result in hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. The Phase I ESA prepared for the Project provided a review of databases containing lists of hazardous materials sites, including those compiled pursuant to Government Code Section 65962.5. The Phase I ESA did not identify hazardous materials sites within or within 1,000 feet of the existing Lake Poway Road pump station site (Ninyo & Moore 2022b).

A search of databases was conducted to confirm if additional hazardous materials sites occur near the remainder of the Project components located beyond a 1,000-foot buffer of the pump station. EnviroStor is a database complied by the California Department of Toxic Substances Control (DTSC) to track hazardous waste facilities or known contaminated sites. GeoTracker is a database compiled by the SWRCB to track sites that impact or could impact water quality, or otherwise require cleanup efforts. Listed sites in these databases are compiled pursuant to Government Code Section 65962.5. During the updated search of these databases, no active sites were identified in EnviroStor or GeoTracker within the Project site (DTSC 2025; SWRCB 2025). GeoTracker listed a cleanup program site for gasoline contaminated soil within 1,000 feet of the Berglund WTP at 14415 Lake Poway Road (T0607302955); however, this case has been closed since 1987 and does not represent a current hazard related to the Project. As the Project is not proposed on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the Project would not result a significant hazard to the public or the environment. Therefore, no impact related to hazardous materials sites would occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Less Than Significant Impact. The Project site is located approximately six miles west of the nearest airport, Ramona Airport, and is not within the boundaries of the airport land use plan for this airport. The southern portion of the Project site is within Airport Influence Area 2 for the Marine Corps Air Station Miramar Airport, located approximately 11.1 miles southwest of the Project site, but is not within a safety or noise hazard zone associated with this airport (San Diego County Regional Airport Authority 2023). Therefore, airports would not result in safety hazards or excessive noise at the Project site and impacts would be less than significant.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The City participates in the County's Multi-Jurisdictional Hazard Mitigation Plan, which is implemented on a regional level and identifies jurisdictional concerns, resources, and action items to ensure community-wide safety (County 2023). In addition, the City is a member of Unified Disaster Council and has concurred with the County's Emergency Operations Plan to provide a comprehensive emergency management system for natural disasters, technological incidents, terrorism, and nuclear-related incidents (County 2022). The actions in these plans are generally administered at the City and regional level. At a project level, the Project would adhere to applicable City codes, such as those requiring adequate emergency access entrances for response.

During construction of the Project, road closures and detours would be required to construct pipelines in the public ROW. Implementation of a traffic control plan, as detailed in Section 2.5.4, would be required during construction in the ROW to maintain safe circulation and notify emergency response teams of temporary circulation changes. Once operational, the Project would not result in substantial additional vehicle trips or Project components within public ROWs. Therefore, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. The majority of the Project site is designated by the California Department of Forestry and Fire Protection (CAL FIRE) as a Very High Fire Hazard Severity Zone (VHFHSZ), with a small portion identified as a High Fire Hazard Severity Zone (CAL FIRE 2025). The Project would not create habitable structures that would place people at risk in the event of a wildland fire. The aboveground structures created by the Project would comply with applicable fire and building codes to protect them from fire hazards. As described in Section 2.5.3, construction activities would avoid areas of dense foliage during dry conditions when possible and, in the event where avoidance is infeasible, would incorporate brush fire prevention measures to ensure construction activities do not generate a risk related to wildland fires. Impacts would be less than significant.

Mitigation

The following mitigation measure would apply to the City and/or their designated contractors during pump station demolition and would reduce potential impacts below a level of significance; no action by the Water Authority is required in relation to POW-6 FCF construction.

HAZ-1 Pump Station Demolition Asbestos Removal. Prior to the start of construction, the construction contractor shall demonstrate to the City that a firm licensed to remove and abate asbestos-containing materials has been retained to conduct pump station demolition activities. The contracted firm shall conduct all demolition activities where there is a potential for asbestos-containing materials to occur, as identified in the Phase I Environmental Site Assessment prepared for the pump station site, and shall demolish, handle, and dispose of all such materials in accordance with applicable regulations provided by U.S. Environmental Protection Agency, the Occupational Safety and Health Administration, California Division of Occupational Safety and Health, San Diego County Air Pollution Control District, and others.

4.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off- site?	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. The Project has the potential to result in water quality impacts due to construction-related discharges in the short-term and runoff from the Project site during long-term operation. Construction of the Project would disturb more than one acre of land and would be subject to the NPDES Construction General Permit, which requires the implementation of a SWPPP. The SWPPP would require implementation of BMPs to prevent polluted runoff, the specifics of which would be determined during the SWPPP approval process. With implementation of erosion control measures specified in the SWPPP, no water quality standards would be violated during Project construction and impacts would be less than significant.

The Project would primarily redevelop existing impervious surfaces and therefore result in minimal changes to long-term water quality; however, as more than 5,000 SF of new impervious surfaces would be created, and the Project qualifies as a Priority Development Project, it is required to comply with the Municipal Separate Storm Sewer System (MS4) Permit. The BMP requirements would be finalized during future design phases but are anticipated to include installation of a biofiltration basin west of the forebay tank and pump station. All Project components would implement permanent BMPs in accordance with the City's BMP Design Manual, which would prevent the Project from violating water quality standards or otherwise substantially degrading surface or ground water quality. Impacts would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The Project would primarily be located within existing, impervious areas and would increase the amount of impervious surface at the Project site by approximately 6,000 SF. This increase in impervious surface would not interfere substantially with groundwater recharge. In addition, the Project site is not located within a medium or high priority basin requiring a groundwater sustainability plan and would not require the withdrawal of groundwater (California Department of Water Resources 2026). Therefore, the Project would not decrease groundwater supplies or interfere substantially with groundwater recharge and impacts would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

   i. Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. During construction, the removal of paved surfaces would expose soils, which may result in erosion or siltation on- or off-site. The Project's implementation of BMPs identified in

a SWPPP would reduce impacts related to erosion and siltation. Upon completion of construction, Project components would be underground or within stabilized surfaces, which would minimize the potential for erosion. With implementation of the construction and permanent BMPs required by the City, impacts related to erosion and siltation would be less than significant.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off- site?

Less Than Significant Impact. The Project would increase impervious surfaces by approximately 6,000 SF in total. Runoff from the Project site would drain in similar patterns to existing conditions across the majority of the Project site. At the pump station and forebay tank, runoff would drain to the west, where a biofiltration basin would be installed for both water treatment and flow control. The Project would not increase the rate or amount of surface runoff such that on- or off- site flooding would occur and impacts would be less than significant.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?

Less Than Significant Impact. As discussed in item 4.10.c.ii above, the Project would not result in substantial changes to the amount of runoff from the Project area. The biofiltration basin would both slow the rate of runoff to an acceptable level for existing off-site stormwater systems and treat runoff to prevent polluted runoff from entering the City's stormwater drainage system. During construction activities, BMPs required by the SWPPP would be implemented to prevent polluted runoff from entering the stormwater drainage system. Impacts would be less than significant.

iv. Impede or redirect flood flows?

No Impact. No portion of the Project site is designated by the Federal Emergency Management Agency (FEMA) as a floodplain (FEMA 2012). The Project site is within Zone X, the areas that have been determined to be outside of the 500-year average floodplain (FEMA 2012). Therefore, the Project would not impede or redirect flood flows and no impact would occur.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. As noted in item 4.10.c.iv above, the Project is not at significant risk of flooding. The Project site is located over 14 miles from the Pacific Ocean and would not be subject to tsunamis. According to the General Plan Safety Element, Lake Poway Dam incorporated design features to prevent failures in the event of seismic shocks and spillways that would minimize the risk of seiche events flooding nearby properties (City 1991). Therefore, it is not anticipated that the Project would risk the release of pollutants due to inundation by flood, tsunami, or seiche events. Impacts would be less than significant.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As described in item 4.10.b, the Project site is not located within an area subject to a sustainable groundwater management plan. The water quality control plan applicable to the Project is the Water Quality Control Plan for the San Diego Basin (Basin Plan). The Project would comply with the Basin Plan by implementing the requirements of the NPDES Stormwater Program, including the

Construction General Permit and MS4 permit. Both construction and operational BMPs would be incorporated into the Project to prevent pollutants from violating water quality standards or waste discharge requirements addressed in the Basin Plan. Impacts would be less than significant.

4.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☒	☐	☐

a) Physically divide an established community?

No Impact. The Project would install water treatment infrastructure within existing City properties or easements and underground within or adjacent to existing roadway ROWs. As such, it would not result in a physical disruption to an established land use or the local pattern of development. The Project would not physically divide an established community and no impact would occur.

b) Cause significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant with Mitigation Incorporated. The Project would occur within the existing Berglund WTP area, City-owned parcels and easements, a Water Authority easement, and the public ROW. The pump station parcel zoned Planned Residential Development is associated with the Bridlewood Specific Plan, which allows public facilities in this zone with approval of a Conditional Use Permit by the City Council. Construction of the proposed water conveyance and treatment infrastructure would not result in changes to the land use designations for the Project area.

As described throughout this Initial Study, the Project has the potential to result in conflicts with policies and/or regulations adopted for the purpose of avoiding or mitigating environmental impacts; however, all of these impacts would be mitigated to less than significant levels. Implementation of mitigation measures BIO-1 through BIO-6 for the City components and standard NCCP/HCP minimization measures by the Water Authority for the POW-6 FCF would reduce or avoid potentially significant impacts to biological resources and would ensure Project compliance with local, Water Authority, state, and federal policies intended to protect biological resources. During excavation activities, the Project also has the potential to result in impacts to unidentified archaeological resources. Implementation of mitigation measure CUL-1 would ensure the Project complies with state and General Plan policies intended to protect archaeological resources.

The Project proposes work within and adjacent to roadway ROWs, which has the potential to result in traffic hazards and impacts to circulation. Adherence to the required traffic control plan would reduce

the potential for adverse impacts related to circulation and ensure consistency with local traffic and safety policies. After construction is completed, roadway surfaces would be returned to their pre-Project conditions and circulation elements would resume functioning as outlined in the General Plan Circulation Element.

As evaluated further in Section 4.13, construction and operational activities have the potential to generate noise adjacent to residences in excess of the limits provided by the Poway Municipal Code. However, mitigation measures NOI-1 through NOI-5 would be implemented and would reduce noise levels due to construction and operation to less than significant levels.

The proposed Project would not result in changes to land use plans and would not result in conflicts with other land use policies adopted for the purpose of avoiding or mitigating an environmental effect. With implementation of the mitigation measures discussed above, impacts would be less than significant.

4.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The Surface Mining and Reclamation Act of 1975 is the primary regulation for surface mining in the state and requires the State Geologist to identify mineral deposits in the state and classify them based on their significance. The classifications include four Mineral Resource Zones (MRZs), Scientific Resource Zones, and Identified Resource Areas.

The Project site is within MRZ-3, which is defined as an area containing known or inferred mineral occurrences of undetermined mineral resource significance (DOC 2017). Installation of Project infrastructure would occur within developed areas that do not currently support mineral extraction activities. The existing residential and open space/recreational land uses surrounding the Project site would be incompatible with mining activities and would hinder the ability of mining to occur at the site in the future. Additionally, the Project site is not zoned or designated for mineral resource recovery uses. The Project would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site. No impact would occur.

4.13 Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant with Mitigation Incorporated. DHK Engineers, Inc. prepared a Noise Impact Report, attached to this Initial Study as Appendix F, to analyze construction and operation noise from the Project (DHK Engineers, Inc. 2023). The Noise Impact Report findings are summarized in the following discussion.

Construction Noise

Section 8.08.100 of the Poway Municipal Code states that construction equipment shall not result in noise levels exceeding an hourly noise level (denoted as L_{EQ}) of 75 dBA for more than 8 hours of a 24-hour period when measured at the property line of a residential land use. This section of the Poway Municipal Code also provides increased construction noise limits for noise that would be generated for a period shorter than eight hours. Unless specifically allowed by the City Engineer, construction equipment may only operate between the hours of 7:00 a.m. and 5:00 p.m. on Mondays through Saturdays.

Equipment required for Project construction would be mobile throughout the site but is anticipated to be operated at an approximately 50-foot average distance from residential property lines adjacent to the site. Construction equipment anticipated to be required for Project construction (Table 1) has typical noise levels between 80 and 85 dBA at 50 feet (Federal Transit Administration 2018). Hourly noise levels at individual residential properties would depend on the required equipment for each phase of construction, distance between the noise source and receiver(s), and any intervening topography or structures. Construction equipment required for each phase would not all operate at the same time or in the same location, and not all construction equipment would be in constant use during a typical 8-hour operating day. Nonetheless, based on the typical noise levels generated by construction equipment,

Project construction has the potential to exceed the applicable noise limits at residential properties as well as ambient noise levels; therefore, construction noise impacts are considered potentially significant. In addition, nighttime construction is anticipated to be required for the City's installation of the pipeline at the Espola Road/Lake Poway Road intersection and the Water Authority's installation of the POW-6 FCF, which could result in significant construction noise impacts. Mitigation measure NOI-1 would require use of a construction noise blanket by the City during pump station construction to attenuate noise levels at residential property lines, mitigation measure NOI-2 would require noticing of construction by the City, and mitigation measure NOI-3 would require BMP implementation to reduce noise associated with construction at residential receptors for all Project components. Construction proposed by the City outside of the typically permitted hours of construction would require approval from the City engineer and implementation of mitigation measure NOI-4. With implementation of mitigation measures NOI-1 through NOI-4 for the City-owned components and NOI-3 for the Water Authority component, construction noise impacts would be less than significant.

Operational Components

Based on the Public Facilities (PF) zoning of the pump station site and the adjacent residential zoning (PRD-1), operational daytime (7:00 a.m. to 7:00 p.m.) noise would be limited to 52.5 dBA L_{EQ}, evening (7:00 p.m. to 10:00 p.m.) noise would be limited to 45 dBA L_{EQ}, and nighttime (10:00 p.m. to 7:00 a.m.) noise levels would be limited to 42.5 dBA L_{EQ} at the shared property lines in accordance with Poway Municipal Code Section 8.08.040.

Noise sources associated with Project operation would include three 125-horsepower (hp) indoor vertical turbine pumps; two 2-hp roof-mounted exhaust fans for the pump room; indoor and outdoor heating, ventilation, and air conditioning (HVAC) units; and a 450-kW emergency generator. No operational noise would result from the pipeline portion of the Project.

With simultaneous operation of the pump station equipment and emergency generator, noise levels would reach 47.7 dBA L_{EQ} at the residence southwest of the pump station site. Section 8.08.170 of the Poway Municipal Code exempts noise associated with emergency work from other provisions of the Noise Ordinance provided the City's Noise Control Officer is notified and equipment is designed to reduce noise to the lowest level consistent with effective operation of such equipment. Therefore, noise associated with operation and testing of the emergency generator is not assessed in comparison with the City's noise standards, as it would be operated only in the event of an emergency and tested during daytime hours for one hour per month and four hours once per year. While the Poway Municipal Code does not specifically exempt routine testing of emergency equipment from the provisions of the Noise Ordinance, it is anticipated that the City's Noise Control Officer would provide an MOU stating testing of the Project's emergency generator would be exempt from the Noise Ordinance during daytime hours and operation of the emergency generator during any and all times for the protection and safety of the public is approved. Therefore, noise associated with the emergency generator would result in a less than significant impact.

During operation of the standard, non-emergency pump station equipment (pumps, fans, and HVAC), noise levels would reach 43.5 dBA L_{EQ} at the nearest residence southwest of the pump station site. Noise associated with pump station operation is assessed in comparison with the City's lowest noise limit, the nighttime limit, as the pump station would be in constant operation. Pump station operation would exceed the 42.5 dBA L_{EQ} nighttime noise limit at two residential property lines southwest of the pump station site (15997 and 15969 Grey Stone Road), thereby resulting in a potentially significant operational

noise impact. Mitigation measure NOI-5 would require the installation of noise-attenuating features with the pump station such that the pump station complies with the applicable property line noise limits. With implementation of mitigation measure NOI-5, operational impacts would be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. The highest potential for vibration during construction would be associated with the roller used to repave and resurface the Project site after underground construction. According to Caltrans, a vibratory roller typically produces peak particle velocity (PPV) of 0.210 inches per second at a distance of 25 feet (Caltrans 2020). The Caltrans threshold for damage to older residential structures, such as those located throughout the Project area, is a PPV of 0.3 inches per second. A PPV of 0.1 inch per second is considered strongly perceptible to human receptors.

The nearest residential structures are approximately 75 feet from the anticipated limits of repaving activity. At 75 feet, a vibratory roller would generate a PPV of approximately 0.063 inches per second.[1] This level of vibration during construction would not exceed the threshold for damage to older residential structures or result in strongly perceptible vibration for human receptors. While construction vibration may be perceptible to humans in the Project area, it would not be anticipated to cause severe annoyance and would occur temporarily. No permanent sources of vibration would be created by the Project. Impacts would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. As noted in item 4.9.e, the Ramona Airport is located six miles from the Project site and the southern portion of the Project site is within Airport Influence Area 2 for the Marine Corps Air Station Miramar Airport. The Project site is not located within the noise contours for either of these airports (San Diego County Regional Airport Authority 2023). Further, the Project would not introduce residents or permanent employees to the Project site who would be exposed to excessive aircraft noise. No impact would occur.

Mitigation

Implementation of mitigation measures NOI-1 to NOI-4 would reduce potential construction noise impacts to a less-than-significant level and mitigation measure NOI-5 would reduce operational noise impacts to a less-than-significant level. All of the following mitigation measures are required of the City and/or their designated contractors, while only mitigation measures NOI-3 and NOI-4 apply to the Water Authority component of the Project (POW-6 FCF).

NOI-1 Construction Noise Barriers. For construction activities occurring at the pump station site, the contractor shall provide a minimum 8-foot-tall temporary noise barrier around the Project site between the construction activity and adjacent residential receptors to the north, west, and south. The barrier shall achieve a minimum noise level reduction of 10 dBA at the residential receptors. A temporary construction noise blanket with Noise Reduction Coefficient 0.95 rating is

[1] Equipment PPV = Reference PPV * (25/D)^n (inches per second), where Reference PPV is PPV at 25 feet, D is distance from equipment to the receiver in feet, and n = 1.1 (the value related to the attenuation rate through the ground); formula from Caltrans 2020.

recommended to achieve this reduction, though use of the existing block wall to reduce noise to the south and west may also achieve the required reduction.

NOI-2 Construction Notices. Construction contractors shall implement and provide evidence to the City of the following:

- Signs shall be posted at the construction site that include permitted construction days and hours, a day and evening contact number for the job site, and a City contact number in the event of problems.

- An on-site complaint and enforcement manager shall respond to, and track, complaints and questions related to noise.

NOI-3 Construction Equipment. To reduce noise impacts due to construction, construction contractors shall implement the following best management practices:

- During construction, the contractor shall outfit all equipment, fixed or mobile, with properly operating and maintained exhaust and intake mufflers, consistent with manufacturers' standards.

- Impact tools (e.g., jack hammers, pavement breakers) used for construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used. External jackets on the tools themselves shall be used where feasible.

- Stationary construction noise sources that could affect adjacent receptors shall be located as far from adjacent receptors as possible.

NOI-4 Nighttime Construction. Prior to the initiation of construction activities outside of the hours of 7:00 a.m. to 5:00 p.m., the construction contractor shall obtain written approval from the City Engineer for the extended hours of construction in accordance with Poway Municipal Code Section 16.44.140. To reduce noise impacts during the short-term, nighttime hours of construction, construction contractors shall implement the following best management practices:

- Schedule excavation and backfill during normal daytime hours (7:00 a.m. to 5:00 p.m.) where feasible to reduce/minimize the number of truck/backhoe operations occurring outside of these hours.

- Provide an 8-foot-tall acoustical barrier around all stationary noise generating equipment (e.g., generators, compressor, welding machine), expected to operate beyond normal daytime hours (outside of the hours between 7:00 a.m. and 5:00 p.m. on Mondays through Saturdays).

- The contractor and construction manager shall conduct a site meeting and walk through prior to 24-hour operations required for pipeline connection, with a special focus on noise considerations. Prior to other construction proposed outside the typically permitted hours of 7:00 a.m. to 5:00 p.m. on Mondays through Saturdays, a site meeting and walk through shall similarly be held.

- During nighttime construction hours (5:00 p.m. to 7:00 a.m.), the contractor shall monitor noise generating operations and sequence tasks to minimize noise impacts to residential receptors.

NOI-5 Pump Station Noise Limits. Noise control features shall be implemented with the operational components of the pump station such that hourly noise levels do not exceed 42.5 dBA L_{EQ} at residential property lines surrounding the Project site. The noise-attenuating features may include, but are not limited to, interior acoustical panels, generator silencers, acoustic louvers, higher Sound Transmission Class-rated doors or enclosures, or an exterior noise barrier. The design engineer shall provide evidence to the City that the pump station, with inclusion of noise-attenuating features, would achieve the applicable noise limit at adjacent residential property lines. The features required for noise attenuation shall be included on final construction plans prior to the City's issuance of permits for pump station building construction.

4.14 Population and Housing

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. The Project involves improvements to water treatment facilities to increase the stability of potable water service to the City's service area. No homes or new employment opportunities would be created such that direct population growth in the Project area would occur. The Project is not intended to expand the availability of water supplies beyond those needed to serve the growth projections provided in planning documents such as the City's Urban Water Management Plan and General Plan. The Project transmission infrastructure would provide new connections between water supplies and the City's treatment facilities, which would not connect to undeveloped areas with the potential for future growth-inducing projects. The Project would not induce unplanned population growth, directly or indirectly, and no impact would occur.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project would not result in removal or alteration of existing residential structures or land uses. Therefore, no people or housing would be displaced by the Project and no impact would occur.

4.15 Public Services

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

a) Fire protection?

Less Than Significant Impact. The Poway Fire Department provides fire protection services within the City and at the existing Berglund WTP. The Project proposes additional infrastructure in close proximity to existing facilities that are served by the Poway Fire Department and is not anticipated to result in a substantial increase in the need for these services. Some Project components, such as pipelines, would be passive infrastructure components contained underground and would not be a potential fire source during operation. The Project also does not include population-inducing components that would require expanded fire protection services. The Project would not require new or altered fire protection facilities and impacts would be less than significant.

b) Police protection?

Less Than Significant Impact. The City, including the Project site, is serviced by the San Diego County Sheriff's Department. Impacts to police protection would be similar to those described above for fire protection services. New facilities would be constructed in close proximity to other City facilities that are serviced by the County Sheriff's Department and no population growth would occur. The Project would not result in the need for new or expanded police protection services and impacts would be less than significant.

c) Schools?

No Impact. The Project would not induce population growth, including that of school-aged children. Therefore, no new or altered school facilities would be required. No impact would occur.

d) Parks?

No Impact. The Project would not result in population growth and, therefore, would not result in an increased need for park facilities or the need for upgrades to existing park facilities. No impact would occur.

e) Other public facilities?

No Impact. No population growth would occur as a result of the Project. Therefore, there would be no increase in the use of public facilities or need for new public facilities. No impact would occur.

4.16 Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. The Project involves improvements to the City's water treatment infrastructure to increase the stability of its water supply. The improvements are intended to serve the existing and planned population of the City and are not anticipated to provide additional resources that would result in population growth. Therefore, the Project would not result in increased use or accelerated deterioration of recreational facilities and no impact would occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The Project does not include recreational facilities or require the construction or expansion of recreational facilities. No impact would occur.

4.17 Transportation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. The Project does not propose changes to existing public circulation elements. During construction within the public ROW, the implementation of a traffic control plan, as described in Section 2.5.4, would maintain acceptable circulation. After construction is completed, the roadways would be restored to their pre-Project condition. Access to the proposed facilities from Espola Road and Lake Poway Road would be provided via driveways that would not conflict with circulation on these roadways.

In relation to trip generation, the Project would continue to be maintained and operated by City and Water Authority staff; therefore, not resulting in new trips. The new vault at the north end of the proposed pipeline would be a new facility requiring site access for routine or emergency maintenance but would generate a minimal number of new trips given maintenance would occur as needed and not on a daily basis. Deliveries to the sodium hypochlorite tank would occur up to once per month. The new trips generated by the Project would be infrequent and would not result in conflicts with existing circulation plans or policies

The City's General Plan Circulation Element includes policies for safe bicycle and pedestrian travel through the City. There are bicycle lanes on both Lake Poway Road and Espola Road, designated by striping that separates bicycle and automobile travel. An existing two-foot-wide pedestrian use trail occurs along the west side of Espola Road. When construction work in the ROW concludes, the Project would restore the roadways to their pre-Project condition, including striping for bicycle lanes and any disturbance of the pedestrian trail. The Project would not interfere with plans or policies regarding bicycle or pedestrian facilities and all re-striping proposed by the Project and conducted by either the City or Water Authority would occur in compliance with City design criteria for these facilities.

The Project does not include any public transit facilities and does not propose components that would interfere with existing or planned transit service. New employees are not anticipated to be required to

staff the proposed facilities such that the Project would result in an increase in ridership in the area. The Project would not result in changes to public transit facilities and would not conflict with future plans for expansion of public transit systems.

In summary, the implementation of a traffic control plan for work in the public ROW would ensure construction related impacts from the Project remain less than significant. No substantial changes to bicycle or public transit facilities would occur and the Project would not conflict with applicable plans for such facilities. The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system and impacts would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. The City has not adopted guidelines for conducting either screening level or full vehicle miles traveled analysis in accordance with SB 743. However, based on the limited number and infrequent nature of trips that would be generated by the proposed Project, it can be determined that the Project would not conflict with CEQA Guidelines section 15064.3, subdivision (b). For example, guidelines prepared by the Office of Land Use and Climate Innovation (formerly Office of Planning and Research) recommend a small project screening threshold of 110 daily trips (Office of Land Use and Climate Innovation 2018). The Project would not generate vehicle trips exceeding this suggested screening threshold and can therefore be presumed to have a less than significant impact related to vehicle miles traveled and CEQA Guidelines section 15064.3, subdivision (b).

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. During construction, the Project would alter traffic patterns to allow work in roadway ROWs. Implementation of a traffic control plan, as described in Section 2.5.4, would ensure that the altered circulation would not result in substantial hazards to construction personnel or users of the circulation system. After construction, existing roadways would be returned to pre-Project conditions and the Project components would not introduce hazardous design features or incompatible uses. Impacts would be less than significant.

d) Result in inadequate emergency access?

Less Than Significant Impact. During construction occurring in the public ROW, a traffic control plan, as described in Section 2.5.4, would be implemented and would ensure that emergency access would remain adequate throughout construction of the Project. After construction activities in the ROW are complete, roadways would be returned to pre-Project conditions, which would accommodate emergency vehicle access. Emergency access to the proposed facilities would be provided in accordance with local fire department requirements. Impacts would be less than significant.

4.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☒	☐	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant with Mitigation Incorporated. HELIX contacted the NAHC on January 12, 2023, for a Sacred Lands File search and list of Native American contacts, which were received on February 17, 2023. The results were negative for the presence of Tribal Cultural Resources and Traditional Cultural Properties in the Project area. Outreach letters were sent on March 14, 2023, to the contacts listed by the NAHC. To date, one response has been received from the San Pasqual Band of Mission Indians, stating that the Project area is within their traditional use area and requesting formal AB 52 consultation.

The City sent letters on August 21, 2023 formally inviting tribes to consult under AB 52. Barona responded on September 15, 2023 indicating concurrence with the management recommendations provided in the Cultural Resources Technical Report. Rincon responded on September 18, 2023 deferring consultation to Kumeyaay Nation given the Project site is located outside of Rincon's traditional use area. While San Pasqual indicated interest in AB 52 consultation in response to informal outreach conducted as part of the Cultural Resources Technical Report, no response to the City's consultation invitation was provided. AB 52 consultation has therefore concluded. Based on the information provided by the Tribes about the sensitivity of the Project vicinity, it is assumed that there is potential for unknown tribal cultural resources to occur within the Project alignment. Disturbance of these resources would result in potentially significant impacts. A Native American monitoring program was recommended by the Project's Cultural Resources Technical Report and the proposed Native American monitoring program is detailed in mitigation measure CUL-1. Consultation in accordance with AB 52 and implementation of mitigation measure CUL-1 would reduce potential impacts to tribal cultural resources to a less than significant level.

4.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. The Project proposes expanded water infrastructure and associated stormwater drainage and electric power facilities. No change to wastewater treatment, natural gas, or telecommunication facilities is proposed and none would be required to serve the Project. The Project's water facilities would treat and distribute supplies that have been dedicated to the City. No future expansion of water facilities is anticipated to be required to serve the Project. Minor alterations to stormwater drainage and electric power components are proposed as part of the Project, the environmental effects of which have been analyzed throughout this Initial Study. No off-site upgrades to centralized or Citywide stormwater or electric power facilities would be required to serve this Project and impacts would be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant Impact. The Project does not involve activities that would require permanent water supplies. Water supplies required during the construction of the Project would be limited to water utilized for dust suppression on site. Sufficient water supplies from the City are available to provide these limited water supplies to the Project during construction. The Project would create water treatment and distribution facilities for planned water supplies in normal, dry, and multiple dry years; however, the Project itself would not require additional water supplies above those required to serve the City. As such, a less than significant impact would occur.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact. Wastewater in the City is managed by the City, as is potable water. The Project proposes potable water treatment infrastructure and would not be a new source of wastewater. Therefore, the wastewater treatment provider (the City) would continue to serve its existing commitments and no impact would occur.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The Project is not anticipated to be a substantial source of solid waste. During construction, disposal of the demolished pump station and asphalt areas where not suitable for reuse would be required. Excavated material would generally be used to refill trenched areas. Operation of the Project would generate solid waste associated with maintenance and treatment supplies; however, these are anticipated to be small quantities of used materials and not substantially increased compared to existing conditions. All solid waste generated by the Project would be disposed of in accordance with applicable solid waste regulations. Due to the small volume of solid waste anticipated to be generated by the Project, the capacity of landfills would not be exceeded. The Project would comply

with applicable federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

4.20 Wildfire

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. See item 4.9.f and Section 2.5.4. Implementation of a traffic control plan would ensure the Project would not interfere with emergency response or evacuation plans during construction. During Project operation, Project components would be located underground or within existing developed properties and public facilities located outside of the public ROW. The Project would also not generate substantial new vehicle trips that would interfere with emergency operations. Impacts would be less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impact. As previously described, the majority of the Project site is designated as a VHFHSZ, with a small portion identified as a High Fire Hazard Severity Zone (CAL FIRE 2025). While the Project vicinity is at risk of wildfire, the Project itself would not exacerbate the potential for wildfire in the vicinity. After construction is completed, pipeline components of the Project would be sealed underground while aboveground components would be located within existing developed properties. The Project would also be built in accordance with applicable fire codes. During construction, the fire safety measures provided in Section 2.5.3 would be implemented to avoid wildfire risks associated with

construction equipment and dry vegetation. The Project would not exacerbate wildfire risks and does not propose residential components that would expose occupants to substantial pollutant concentrations in the event of a wildfire. Impacts would be less than significant.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. The Project proposes the installation of water treatment and transmission infrastructure. Construction BMPs would include fire prevention measures if Project construction is required to occur in dense foliage during dry conditions (see Section 2.5.3). Proposed infrastructure would be constructed in accordance with applicable fire codes and would not exacerbate fire risks when construction activities are complete. Temporary and ongoing impacts to the environment as a result of infrastructure installation are analyzed throughout this Initial Study. Impacts would be less than significant.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impact. The Project would not create habitable structures that would be exposed to wildfire risks. Further, the Project does not propose substantial changes to runoff or drainage patterns and does not propose substantial changes to slopes that would result in slope instability in the Project area. Therefore, the Project would not expose people or structures in the Project vicinity to post-fire flooding or landslides and impacts would be less than significant.

4.21 Mandatory Findings of Significance

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present, and probable future projects)?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant with Mitigation Incorporated. The Project has the potential to result in significant impacts to coastal California gnatcatcher, least Bell's vireo, nesting birds, and Diegan coastal sage scrub; however, implementation of mitigation measures BIO-1 through BIO-6 by the City and standard NCCP/HCP minimization measures by the Water Authority would reduce these impacts to a less than significant level. The Project also has the potential to impact significant cultural and tribal cultural resources. Implementation of mitigation measure CUL-1 would ensure these impacts are reduced to a less than significant level. Therefore, the Project would not substantially degrade the environment, decrease the number or habitat of special status plant or animal species, or eliminate major periods of California history. Impacts would be less than significant with mitigation incorporated.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present, and probable future projects)?

Less Than Significant with Mitigation Incorporated. CEQA Guidelines Section 15130 requires a discussion of the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable," meaning that the project's incremental effects are considerable when viewed in connection with the effects of past, current, and probable future projects. As shown in Table 1, it is anticipated that the Water Authority would abandon existing 24-inch and 27-inch pipelines and construct the POW-6 FCF at a similar time as the City proposes construction of the remaining Project components. These components have been analyzed together as the Project throughout this Initial Study; therefore, the potential effects of overlapping construction periods have been considered. No other proposed developments have been identified adjacent to the Project site such that localized cumulative impacts would occur.

The Project would provide a new service connection for treated water to be provided to the City from the Water Authority's Ramona pipeline. This connection would provide new water supplies to the City and allow flexibility for maintenance within the Berglund WTP. The water resources provided by the Water Authority are not anticipated to induce substantial or unplanned population growth into the City; therefore, cumulative effects related to indirect growth inducement are not anticipated to occur as a result of the Project.

All resource topics have been analyzed in accordance with the CEQA Guidelines and found to pose no impact, a less than significant impact, or a less than significant impact with mitigation. The Project would implement the BMPs and mitigation measures identified throughout this Initial Study to avoid the net loss of biological, cultural, and paleontological resources when considered in combination with other development throughout the region. Potential cumulative projects that could be constructed in the vicinity of the Project would also be required to comply with existing applicable federal, state, and local regulations.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant with Mitigation Incorporated. The Project would not consist of any construction activities or operational components that would negatively affect any persons in the vicinity. In addition, all resource topics have been analyzed in accordance with the CEQA Guidelines or associated thresholds and found to pose no impact, a less than significant impact, or a less than significant impact with mitigation incorporated. As discussed in Section 4.3, no violations of air quality thresholds would occur and no significant impacts to sensitive receptors related to pollutants would occur. As discussed in Section 4.9, with implementation of mitigation measure HAZ-1, demolition involving hazardous materials would be managed to prevent adverse effects to humans and no long-term hazardous materials and/or wastes would be generated by the Project such that an adverse effect on humans would occur. Mitigation measures NOI-1 through NOI-5 would be required to reduce construction and operational noise levels at nearby residences, thereby preventing a substantial adverse effect on these sensitive receptors. During construction in the ROW, temporarily altered traffic conditions may occur; however, implementation of a traffic control plan would ensure emergency access and evacuation routes are maintained. As discussed in Sections 2.5.3 and 4.20, while portions of the Project are within a VHFHSZ, the Project would not increase risks related to wildfires and would incorporate fire prevention measures during construction when necessary. With implementation of these mitigation measures and BMPs, the Project would not result in environmental effects that would cause substantial adverse effects on human beings directly or indirectly.

5.0 References

Black & Veatch. 2026. Updated Supplemental Preliminary Design Report. Design Services for Treated Water Facilities. February 27.

2022. Supplemental Preliminary Design Report. Design Services for Treated Water Facilities. December 13.

California Air Pollution Control Officers Association (CAPCOA). 2022. CalEEMod version 2022.1. User's Guide. Available at: https://www.caleemod.com/user-guide.

2008. CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act. Available at: http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf. January.

California Department of Conservation (DOC). 2020. California Important Farmland Finder. Available at: https://maps.conservation.ca.gov/DLRP/CIFF/.

2017. California Geological Survey Updated Mineral Land Classification Map for Portland Cement Concrete-Grade Aggregate in the Western San Diego County Production-Consumption Region, California.

California Department of Forestry and Fire Protection (CAL FIRE). 2025. City of Poway – San Diego County Local Responsibility Area Fire Hazard Severity Zones. March 24.

California Department of Transportation (Caltrans). 2020. Transportation and Construction Vibration Guidance Manual. April.

2019. List of Eligible and Officially Designated State Scenic Highways. Available from: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. August.

California Department of Toxic Substances Control (DTSC). 2025. Envirostor. Available at: https://www.envirostor.dtsc.ca.gov/public/. Accessed August 8.

California Department of Water Resources. 2026. SGMA Basin Prioritization Dashboard. Available at: https://gis.water.ca.gov/app/bp-dashboard/final/. Accessed January 6.

California State Water Resources Control Board (SWRCB). 2025. GeoTracker. Available at: https://geotracker.waterboards.ca.gov/. Accessed August 8.

DHK Engineers, Inc. 2023. Noise Impact Report Poway Treated Water Facilities and Redundant Pipeline Project (Forebay Tank and Pump Station). August.

Federal Emergency Management Agency (FEMA). 2012. Flood Insurance Rate Map, Map Number 06073C1094G. Revised May 16.

Federal Transit Administration. 2018. Transit Noise and Vibration Impact Assessment Manual. September.

HELIX Environmental Planning, Inc. (HELIX) 2026a. Air Quality, Greenhouse Gas Emissions, and Energy Assessment for the City of Poway Treated Water Facilities & Redundant Pipeline Project. May 5.

2026b. City of Poway Treated Water Facilities & Redundant Pipeline Project (Project No. WTR0028) Biological Technical Report. May.

2026c. City of Poway Treated Water Facilities & Redundant Pipeline Project (Project No. WTR0028) Cultural Resources Technical Report. May.

Kennedy/Jenks Consultants, Inc. 2025. Personal communication via email from Andrew Webster of Kennedy/Jenks. November 24.

2021. City of Poway Final Treated Water Service Connection Facility Planning Study. March 12.

Ninyo & Moore. 2022a. Geotechnical Evaluation Treated Water Facilities and Redundant Pipeline Project. December 12.

2022b. Phase I Environmental Site Assessment Lake Poway Road Pump Station. September 19.

Office of Environmental Health Hazard Assessment (OEHHA). 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. Available at: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf. February.

Office of Land Use and Climate Innovation. 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. December.

Poway, City of (City). 2010. City of Poway Transportation Master Element. March.

1991. Poway Comprehensive Plan, Volume One – The General Plan. Adopted November 19.

San Diego, City of. 2022. California Environmental Quality Act Significance Determination Thresholds. September.

San Diego, County of (County). 2023. Multi-Jurisdictional Hazard Mitigation Plan. Adopted February 7.

2022. Operational Area Emergency Operations Plan. September.

San Diego County Regional Airport Authority. 2023. ALUCP Mapping Tool. Available at: https://sdcraa-aluc.maps.arcgis.com/apps/webappviewer/index.html?id=945b3a6b12a34b158d8c9022251542e3. Accessed April 4.

San Diego County Water Authority (Water Authority). 2010. San Diego County Water Authority Subregional Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP). October.

San Diego Air Pollution Control District (SDAPCD). 2023. 2022 Regional Air Quality Strategy (RAQS). Available at: https://www.sdapcd.org/content/dam/sdapcd/documents/grants/planning/Att.%20A%20-%202022%20RAQS.pdf. Adopted March 9.

2020. 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County. October.

2019. Rule 20.2 New Source Review Non-Major Stationary Sources. Revised June 26. Available at: https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-20.2.pdf.

U.S. Census Bureau. 2024. U.S. Census Bureau Quick Facts. Available at: https://www.census.gov/quickfacts/fact/table/sandiegocitycalifornia,powaycitycalifornia,US/PST045224.

6.0 Preparers

City of Poway
Eric Heidemann, Director of Public Works
Julie Procopio, Director of Development Services
Robert Weber, PE, Principal Civil Engineer – Utilities
Don Neu, Interim Principal Planner
Kevin Parker, Senior Planner
Mary Piscitelli, Associate Planner

San Diego County Water Authority
Sean Paver, Principal Water Resources Specialist
Summer Adleberg, Water Resources Manager

Kennedy/Jenks Consultants, Inc.
Andrew L. Webster, PE, Senior Water Resources Manager
Timothy Waters, PE Project Manager

HELIX Environmental Planning, Inc.
Joanne Dramko, AICP, Principal-in-Charge, QAQC
Shelby Bocks, Project Manager
Luis Cabrera-Medina, Environmental Planner
Katie Duffield, Senior Biology Project Manager
Nikki Falvey, RPA, Archaeologist
Sean Bohac, Senior GIS Specialist
Mika Leslie, GIS Specialist
Linda Garcia, Document Processing