

**CITY OF POWAY
ENVIRONMENTAL INITIAL STUDY
AND CHECKLIST**

A. INTRODUCTION

This Environmental Initial Study and Checklist, along with information contained in the public record, comprise the environmental documentation for the proposed project as described below pursuant to the requirements of the California Environmental Quality Act (CEQA). Based upon the information contained herein and in the public record, the City of Poway has prepared a Mitigated Negative Declaration for the proposed project.

B. PROJECT INFORMATION

1. Project Title: Kirkham Wireless Facility
2. Lead Agency Name and Address: City of Poway, Development Services
13325 Civic Center Drive, Poway, CA 92064
3. Contact Person and Phone Number: Austin Silva (858-668-4658)
4. Project Location: South Poway Specific Plan area and 13875 Kirkham Way
5. Project Sponsor's Name and Address: PlanCom Inc./302 State Place, Escondido, CA 92029
6. General Plan Designation: Planned Community (PC)
7. Zoning: Planned Community (PC) – Light Industrial
8. Description of Project: The proposed project includes a request to amend the South Poway Specific Plan to allow freestanding wireless communication facilities to have a maximum height of 90 feet as a conditional use. A Conditional Use Permit (CUP) was also submitted concurrently with the Specific Plan Amendment (SPA) to allow a freestanding wireless communication facility consisting of an 85' 6"-tall monopole and equipment enclosure that will allow for co-location of antennas for up to three wireless carriers. The monopole would be constructed of galvanized steel and treated with an anti-reflective coating. The gray and white antennae would be situated along steel arms that are configured into three segments that reach outward from the monopole. The monopole will be setback approximately 96 feet from Kirkham Way. Five pine trees will be planted in existing landscape planters adjacent to Kirkham Way. Two new equipment cabinets will be located on new concrete pads and will be screened by a 10-foot-long by 15-foot-wide by eight-foot-tall block wall just east of the monopole.
9. Surrounding Land Uses and Setting: The project site is located in the South Poway Specific Plan (SPSP) area. The SPSP area is located at the southern end of the City and includes a variety of land uses including industrial, commercial, residential, and open space. Single-family residential neighborhoods are north and west of the SPSP boundary. The southern portion of the SPSP area mostly contain natural habitat except for a mining facility. The southern boundary of the SPSP borders the City of San Diego with a single-family residential upslope of Beeler Canyon. The east end of the SPSP area is surrounded by natural habitat except for an equestrian facility that is south of Scripps Poway Parkway.

The project site for the proposed wireless communication facility is owned by the City and is

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currently developed and used as a storage lot for new vehicle inventory by dealers located in the City. The immediate surrounding land uses include a General Atomics industrial building to the north, ABC SD Chapter Apprenticeship Training center to the west, a modular building storage lot to the east and vacant sloping land designated as Open Space to the south.

10. Other public agencies whose approval is required (e.g.: permits, financing approval, or participation agreement): None

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.?

In accordance with Government Code Sections 65352.3 and 65342.4 and Public Resources Code Section 21080.3.1, the City of Poway, as Lead Agency, sent a letter to the Tribal Representatives notifying the tribes identified by the Native American Heritage Commission (NAHC) of the proposed project in accordance with AB 52 and SB 18. The City received a response from the Viejas Band of Kumeyaay Indians and consultation has occurred and concluded. Responses to the AB 52 and SB 18 consultation notices are discussed further in this document.

NOTE: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

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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" as indicated by the checklist on the following pages.

<input type="checkbox"/> Aesthetics <input type="checkbox"/> Biological Resource <input type="checkbox"/> Greenhouse Gas Emissions <input type="checkbox"/> Land Use and Planning <input type="checkbox"/> Population and Housing <input type="checkbox"/> Transportation <input type="checkbox"/> Mandatory Findings of Significance	<input type="checkbox"/> Agricultural /Forestry Resources <input type="checkbox"/> Cultural Resources <input type="checkbox"/> Hazards/Hazardous Materials <input type="checkbox"/> Mineral Resources <input type="checkbox"/> Public Services <input type="checkbox"/> Tribal Cultural Resources <input type="checkbox"/> Wildfire	<input type="checkbox"/> Air Quality <input type="checkbox"/> Energy <input type="checkbox"/> Geology /Soils <input type="checkbox"/> Hydrology / Water Quality <input type="checkbox"/> Noise <input type="checkbox"/> Recreation <input type="checkbox"/> Utilities and Service Systems
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Determination (To be completed by the Lead Agency):

On the basis of this initial evaluation:

<p>I find that the proposed project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.</p>	<input checked="" type="checkbox"/>
<p>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 as revisions in the project have been made by or agreed to by the project proponent and/or mitigation has been agreed to. A MITIGATED NEGATIVE DECLARATION will be prepared.</p>	<input type="checkbox"/>
<p>I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.</p>	<input type="checkbox"/>
<p>I find that the proposed 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 ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.</p>	<input type="checkbox"/>
<p>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.</p>	<input type="checkbox"/>



 City of Poway

8/11/2021

 Date

C. EIS and Checklist

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
I. AESTHETICS. Except as provided in Public Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?			X	
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
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?			X	
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	
II. AGRICULTURAL AND FORESTRY RESOURCES.				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the				

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state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				X
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?				X
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
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))?				X
d. Result in the loss of forest land or conversion of forest land to non-forest land?				X
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?				X
III. AIR QUALITY				
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:				

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a. Conflict with or obstruct implementation of the applicable air quality plan?				X
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?				X
c. Expose sensitive receptors to substantial pollutant concentrations?			X	
d. Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?				X
IV. BIOLOGICAL RESOURCES. 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 Game or U.S. Fish and Wildlife Service?				X
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 Game or U.S. Fish and Wildlife Service?				X
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?				X
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede				X

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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?				X
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?				X
V. CULTURAL RESOURCES. Would the Project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?				X
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?			X	
c. Disturb any human remains, including those interred outside of dedicated cemeteries?			X	
VI. ENERGY. 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?			X	
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X
VII. GEOLOGY AND SOILS. Would the project:				

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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.				X
ii) Strong seismic ground shaking?				X
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b. Result in substantial soil erosion or the loss of topsoil?				X
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 offsite landslide, lateral spreading, subsidence, liquefaction or collapse?				X
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risk to life or property?				X
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?				X
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or			X	

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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?			X	
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				X
b. Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				X
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?				X
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?				X
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 within the project area				X
f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?				X
g. Expose people or structures either directly or indirectly, to a significant			X	

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risk of loss, injury or death involving wildland fires?				
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				X
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or offsite?				X
(i) result in substantial erosion or siltation on- or offsite?				X
(ii) substantially increase the rate or amount of surface runoff in a matter which would result in flooding on- or offsite;				X
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				X
(iv) impede or redirect flood flows?				X
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X

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e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X
XI. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?				X
b. Cause a 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?				X
XII. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?				X
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?				X
XIII. NOISE. 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?			X	
b. Generation of, excessive ground borne vibration or ground borne noise levels?			X	
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				X

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project area to excessive noise levels?				
XIV. POPULATION AND HOUSING.				
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)?				X
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X
XV. PUBLIC SERVICES.				
a. 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.				
i. Fire protection?				X
ii. Police protection?				X
iii. Schools?				X
iv. Parks?				X
v. Other public facilities?				X
XVI. RECREATION.				
a. Would the project 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?				X
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities				X

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which might have an adverse physical effect on the environment?				
XVII. TRANSPORTATION Would the project:				
a. Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				X
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?				X
c. Substantially increase hazards due to a geometric design feature (e.g.: sharp curves or dangerous intersections) or incompatible uses (e.g.: farm equipment)?				X
d. Result in inadequate emergency access?				X
XVIII. TRIBAL CULTURAL RESOURCES				
a. Would the project 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				X
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			X	

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<p>subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>				
<p>XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:</p>				
<p>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?</p>				X
<p>b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?</p>				X
<p>c. Result in the 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?</p>				X
<p>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?</p>				X
<p>e. Comply with federal, state and local management and reduction statutes and regulations related to solid waste?</p>				X
<p>XX. WILDFIRE -- If located in or near state responsibility areas or lands</p>				

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classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
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?				X
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?				X
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?				X

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XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
<p>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 or the major periods of California history or prehistory?</p>				X
<p>b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulative considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?</p>			X	
<p>c. Does the project have environmental effects which will cause substantial adverse effects on human beings either directly or indirectly?</p>				X

D. DISCUSSION OF ENVIRONMENTAL EVALUATION

Please refer to the Environmental Initial Study Checklist Form above when reading the following evaluation.

I. AESTHETICS:

a & c. **Less Than Significant Impact.** There is no landmark tree, view lake, historic structure, etc., in the existing setting of this business commercial area parking lot. The project is not located in a particularly scenic location. The potential for view impacts is based more on interruption of expansive, or panoramic views. Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views may include an urban skyline, valley, mountain range, etc. Helix Environmental Planning, Inc. prepared an aesthetic analysis (May 6, 2021) which included a viewshed analysis. The viewshed analysis indicates that the proposed monopole would be visible from 16 percent of the viewshed.

The assessment of impacts in the aesthetic analysis is based on the level of change to viewers from the existing condition of the site to after construction of the proposed monopole. The level of changes was assessed from the most critical viewpoints from parks, trails, and nearby roadways as required by CEQA. The significance of the impact was then based on how dissimilar the proposed monopole would be to the existing visible features, and the magnitude of that visual impact. Items considered included if the project is actually seen (and when), the level of dominance it plays in the overall view, elements of distance, angle of view, length of time it may be observed, and the relative size to its surrounding setting.

The analysis determined that the project would not be visible from Bette Bendixen Minipark and the Poway Sportsplex due to topography. The proposed monopole cell tower would be visible from recreational ball fields on private property off Kirkham Road northeast of the project site. Although, the cell tower is linear in design and would not obstruct overall all views from this location. Views of the rolling hillsides and slopes south of the project site would remain visible.

A portion of the cell tower would be visible from Stonebridge Neighborhood Park and the Sycamore Estates neighborhood which are located south of the project site in the City of San Diego. Stonebridge Neighborhood Park is at a slightly higher elevation providing a clear view to the proposed cell tower minus intervening structures and vegetation. Views from the park are obscured by playfield structures and mature landscaping along Stonebridge Parkway as shown in Figure 8 of the aesthetic analysis. While the cell tower would be visible, it would not present a substantial disruption to the distant background views of the mountains to the north and west because it is linear in design and the mountains would remain clearly visible.

The cell tower would be visible on the horizon from the northern end of Cypress Canyon Park, which is located southwest of the project site in the City of San Diego. Looking to the east from the perimeter walking path, the cell tower would be visible above the existing cluster of buildings in the project's vicinity. Again, the cell tower is linear in design and would not comprise a significant portion of the overall view from the walking path. Views of the distant mountains would remain unobstructed as users of the path

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move in either direction, their visual focus changes. Therefore, views of the cell tower would be momentary and would not constitute a substantial change to the existing views from this location.

The proposed cell tower would also be visible from portions of trails in the area such as the Beeler Creek Trail, southern portions of the Espola Trail, and the South-Poway (Trans-County) Trail, all of which are multi-purpose trails supporting pedestrians, bikers, and equestrians. The views that are available to the cell tower are limited and users of the trails are not stationary with their viewshed changing as they traverse the trails. Visual access to the existing scenic amenities would be essentially unchanged. The introduction of the linear designed structure would not substantially obstruct or degrade views through the project to hillsides and mountains that are accessible from the trails.

Views from roadways would be generally limited in duration to moving nature of drivers, passengers, and bicyclists. The viewer would be expected to approach and pass areas of visibility, or have views blocked by turning roadway alignments and intervening uses. Although drivers would be expected to notice changes of the site due to construction of the proposed monopole, their primary focus on driving coupled with the relatively short duration of view exposure to the project site minimizes visual impacts from the project.

The project proposal includes the addition of five new pine trees to be planted in existing landscape planter along the northern property line adjacent to Kirkham Way. These trees will help in blend the proposed monopole with natural elements in the area reducing the visual impact. The monopole design was preferred because of a San Diego Gas and Electric (SDGE) transmission corridor approximately 500 feet west of the site consisting of 75 to 80 feet-tall tubular steel poles that support overhead transmission lines. The towers are situated 350 feet apart along a four-mile segment that connect the Pomerado substation to the north to the Sycamore Canyon substation to the south. The monopole design integrates with the SDGE transmission poles and industrial park setting.

The project site is located in an urban area that is zoned Planned Community 7 (PC-7) – South Poway Business Park with a land use designation where wireless communication facilities are permitted as a conditional use. The maximum height for a structure in the PC-7 zone is 45 feet. The proposed 85'6" tall cell tower does not comply with current zoning regulations. However, a Specific Plan Amendment is proposed in conjunction with the Conditional Use Permit for the wireless communication facility (WCF) that would allow WCFs to have a maximum height of 90 feet. If the Specific Plan Amendment is approved, the proposed cell tower would be consistent with zoning regulations.

The City of Poway General Plan Resources Element Goal IV and corresponding strategies state that it is the goal of the City to reserve its scenic resources through the preservation of scenic areas, prominent vistas, and open space. The project site is developed as a paved parking lot with ornamental trees and security lighting in an area developed with industrial buildings and business park land uses. Therefore, the project is consistent with the goals of the General Plan by not disturbing any scenic resources.

- b. **No Impact.** The proposed cell tower is located within an existing developed lot that is void of scenic resources. The existing trees onsite are ornamental and do not constitute

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a scenic resource. Additionally, there are no rock outcroppings or historic resources onsite and Kirkham Road is not considered a state scenic highway. Therefore, the project would not substantially damage scenic resources.

- d. **Less Than Significant Impact.** The proposed project includes the removal of an existing light standard and the luminaries and light arm will be replaced on the cell tower. Light emanating from these sources would be directed downward for security and would be consistent with the lighting standards of the South Poway Specific Plan and Chapters 17.10 and 17.42 of the Poway Municipal Code.

The cell tower is designed to be less obtrusive and not use reflective materials. Antenna sock covers would be installed around all antennas and the monopole trunk is designed to simulate heavy bark. Additionally, all branches will extend a minimum of two feet beyond the antennas, further shielding metal materials. Therefore, the project would not provide a new source of substantial light or glare.

II. AGRICULTURAL AND FORESTRY_RESOURCES:

- a-e. **No Impact.** There will be no impacts to agricultural resources since the site is not designated, nor has it been historically or currently used for farmland. The subject site is zoned PC-7 and is not subject to a Williamson Act contract. The project site does not contain, and is not zoned for, forest land, timberland or timberland zoned Timberland Production. The project would not result in other changes to the environment that would result in the conversion of farmland to non-agricultural uses.

III. AIR QUALITY:

- a. **No Impact.** The City of Poway is part of the San Diego Air Basin and air quality in the area is administered by the San Diego County Air Pollution Control District (APCD). An air quality management plan (AQMP) describes air pollution control strategies to be taken by a City, County or region classified as a non-attainment area to meet the Clean Air Act (CAA) requirements. The main purpose of an AQMP is to bring the area into compliance with the requirements of federal and state air quality standards, and to coordinate regional and local governmental agencies to achieve air quality improvement goals. In San Diego County, this attainment planning process is embodied in the Regional Air Quality Strategies (RAQS) developed jointly by the Air Pollution Control District (APCD) and the San Diego Association of Governments (SANDAG). The RAQS outlines the APCD's plans and regulatory control measures designed to attain state air quality standards for ozone. The RAQS was initially adopted in 1992 with the most recent update occurring in 2016. Land use plans and build out projections of the General Plans of jurisdictions within the San Diego area were considered in establishing the strategies of the Regional Air Quality Strategies Plan. The Poway General Plan includes strategies that are directed toward reducing air emissions through land use patterns, transportation planning, regional agency cooperation, energy conservation, and construction.

The development of a wireless communication facility will not have a significant adverse long-term impact on air quality in the area. Therefore, the project will not violate any air quality standards and no impact would occur.

- b. **No Impact.** See III.a above.

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- c. **Less Than Significant Impact.** Construction of the project would include excavating dirt for the footing of the monopole structure which may result in the creation of dust. Standard City best management practice requirements include implementation of dust control measures and the operations are subject to San Diego Air Pollution Control District standards. Less than significant would occur.
- d. **No Impact.** The project will not result in the creation of objectionable odor. No impact would occur.

IV. BIOLOGICAL RESOURCES:

- a-d, f. **No Impact.** The proposed wireless communication facility would be located in an existing landscape planter on a developed lot. There is no potential for any biological impacts to occur.
- e. **No Impact.** Any trees removed in association with the construction of the project would require replacement pursuant to Chapter 12.32 of the Poway Municipal Code (Urban Forestry). No impact would occur.

V. CULTURAL RESOURCES:

- a. **No Impact.** The subject site is a developed lot primarily consisting of a parking lot with a small structure that does not contain any historical resources. No impact would occur.
- b & c. **Less Than Significant Impact.** The Viejas Tribal Government responded to a formal project notification to native tribes with influence in the Poway area and determined that the project site has cultural significance to the Viejas Band of the Kumeyaay Indians. It was requested that a Kumeyaay cultural monitor be on site for ground disturbing activities to inform them of any “new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.” The project site is previously developed. While there has been no evidence presented during Tribal Consultation to indicate that there is a reasonable possibility of a significant impact, the Conditional Use Permit will include a condition that a Kumeyaay cultural monitor shall be on site during ground disturbing activities. Therefore, there will be a less than significant impact.

VI. ENERGY

- a. **Less Than Significant Impact.** Construction of the project would create temporary increased demands for electricity and vehicle fuels compared to existing conditions. Construction of the project would require electricity use to power construction equipment. Electricity use during construction would vary during different phases of construction. The majority of construction equipment would be gas powered. Since the project site is already served by onsite electrical infrastructure, adequate electrical infrastructure capacity is available to accommodate the electricity demand during construction. Operation of the cell tower and associated equipment would result in an increase in electricity demands. However, there is sufficient electricity infrastructure in the region for the increase in electricity demand and the project would not require expanded electricity

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supplies. Therefore, impacts from energy use during short-term construction activities and operation would be less than significant.

- b. **No Impact.** The project would not conflict with any state or local plans for renewable energy or energy efficiency. The project would be required to comply with all state and local building codes for construction of the project. No impact would occur.

VII. GEOLOGY AND SOILS:

- a.i. **No Impact.** No active known faults traverse the project site or are near the site. The nearest known fault is an unnamed fault located approximately three miles west of the project site. Murphy Canyon Fault is the nearest main southern California fault, located approximately ten miles southwest of the project site. Three major fault systems within the project vicinity include the Elsinore, San Jacinto and Rose Canyon faults. The active Elsinore fault trends northwest and is about 22 miles northeast of Poway. The San Jacinto fault is also an active northwest-trending fault about 45 miles northeast of Poway. The Rose Canyon fault is located about 16 to 20 miles west of Poway in the Pacific Ocean and is considered potentially active. There is potential for some local damage in the event of a major earthquake along one of these fault systems which could result in significant impacts to project facilities. While the potential for on-site rupture cannot be completely discounted (e.g. unmapped faults could conceivably underlie the site), the likelihood for such an occurrence is considered low due to the absence of known faulting within or adjacent to the site. No impact would occur.
- a.ii. **No Impact.** The project site is located in seismically active southern California and is likely to be subjected to moderate to strong seismic ground shaking. Seismic shaking at the site could be generated by events on any number of known active faults in the region, including several unnamed faults, larger faults such as Murphy Canyon Fault, and major fault systems such as Elsinore, San Jacinto and Rose Canyon. An earthquake along any of these known active fault zones could result in severe ground shaking and consequently cause injury and/or property damage in the project vicinity. The proposed cell tower will be required to be designed and constructed to meet the California Building Code. No impact would occur.
- a.iii. **No Impact.** The project is not located in an area that has potential for liquefaction. No impacts from seismically related ground failure would occur.
- a.iv. **No Impact.** The project site is not underlain by formations identified as susceptible to seismically induced landslides. No impact would occur.
- b. **No Impact.** There will be minimal ground disturbance to accommodate the proposed wireless communication facility. Standard erosion control measures will be implemented and will not result in the substantial soil erosion or the loss of topsoil. No impact would occur.
- c. **No Impact.** The project site is not located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project. The building pad and access for the monopole will be graded according to City requirements and fill material which will be compacted in compliance with City standards and inspected for adequacy before the issuance of any building permits. No impact would occur.

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- d. **No Impact.** Expansive soils change in volume (shrink or swell) due to changes in moisture content of the soil. The buildings will be constructed in accordance with geotechnical recommendations that incorporate California Building Code (CBC) standards, as required by the City of Poway. No impact would occur.
- e. **No Impact.** The proposed WCF is does not include any septic tanks or wastewater disposal systems as this project is unmanned and will not require workers to be onsite except for monthly maintenance visits. Therefore, no impact will occur.
- f. **No Impact.** Pursuant to the South Poway Planned Community Development Plan Final EIR adopted in July 1985, the geologic formations in the area are not conducive to fossil formation. Within the Pomerado Conglomerate and the Stadium Conglomerate, the large cobbles present during deposition tend to break up or crush and fossils which may have been present. Friars formation is not known to be a rich source of fossiliferous materials. Generally, the site is not considered a significant source of paleontological resources.

VIII. GREENHOUSE GAS EMISSIONS:

- a & b. **Less Than Significant Impact.** Temporary impacts related to green house gas emissions may occur during construction of the project construction worker vehicle trips and from construction vehicles operating at the site. However, negligible or no greenhouse gas emissions would be generated during the ongoing operation of the WCF because it is an unmanned facility. The unmanned WCF will not generate and vehicle trips to the site except for a maintenance vehicle visiting the site once a month. Therefore, a less than significant impact will occur.

IX. HAZARDS AND HAZARDOUS MATERIALS:

- a. **No Impact.** Construction activities associated with the development of the proposed project would involve the use of potentially hazardous materials, vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Implementation of the proposed project would result in the development of a wireless communications facility. It is not anticipated that large quantities of hazardous materials would be permanently stored or used within the project site. Similarly, the project would not emit hazardous emissions or handle hazardous materials. Small quantities of publicly available hazardous materials (e.g., paint, maintenance supplies) may be routinely used within the project site for maintenance and cleaning. However, these materials would not be used in sufficient strength or quantity to create a substantial risk to human or environmental health. Therefore, implementation of the proposed project would not create a permanent significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials. No impact would occur.
- b. **No Impact.** As the project does not propose heavy use of hazardous materials, it will not create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment. No impact would occur.

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- c. **No Impact.** As the project does not propose the heavy use of hazardous materials, it will not emit hazardous emissions or acutely hazardous materials into the environment. No impact would occur.
 - d. **No Impact.** The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, as such would not create a significant hazard to the public or environment. No impact would occur.
 - e. **No Impact.** The project site is not located within an airport land use plan or within two miles of a public airport. The closest airports to the project site are Marine Corps Air Station Miramar, located approximately 6.5 miles southwest of the project site and Gillespie Field, located approximately 10 miles southeast of the project site. Thus, the project would not result in a safety hazard for people residing or working in the project area and no impact would occur. No impact would occur.
 - f. **No Impact.** The project would not impair or physically interfere with an adopted emergency response or evacuation plan. The project would not interfere with people's ability to utilize roadways for evacuation purposes and, on a more local level, emergency vehicle lanes within the project parking lot would be kept free of vehicles and storage materials in compliance with City ordinances. Accordingly, no impact would occur.
 - g. **Less than Significant Impact.** According to the Very High Fire Hazard Severity Zones (VHFHSZ) map for Poway (CAL FIRE 2009), the project site is located within the VHFHSZ. The proposed monopole would be required to comply with construction standards for development within the VHFHSZ established by the California Building Code and related City of Poway amendments. Accordingly, the exposure to people or structures either directly or indirectly would have less than significant impact on the risk of loss, injury or death involving wildland fires.
- X. HYDROLOGY AND WATER QUALITY:
- a. **No Impact.** The project will comply with all storm water quality regulations or waste discharge requirements surface water quality as governed by the State Water Resources Control Board (SWRCB), the County of San Diego, and the City of Poway. The project will require a grading permit, a Stormwater Pollution Prevention Plan (SWPPP), and a Storm Water Quality Management Plan (SWQMP), which will be ensured as part of the project improvements plan review and building permit process. The project will not violate any water quality standards or waste discharge requirements. No impact would occur.
 - b. **No Impact.** The project does not propose any construction activities that would directly affect groundwater, contribute to the depletion of groundwater supplies or interfere with groundwater recharge. No impact would occur.
 - c (i-iv). **No Impact.** The project involves the construction of a WCF with new landscaping that will be located in an existing landscape planters and will not alter the existing drainage pattern of the site. The WCF would not create or contribute to additional runoff water as the existing landscape planters have been designed to handle irrigation for landscaping. No impact would occur.

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- d. **No Impact.** The project is not located in a flood hazard, tsunami, or seiche zone that would pose the risk of pollutants being released due to project inundation. No impact would occur.
- e. **No Impact.** See X.a and X.b above. No impact would occur.

XI. LAND USE AND PLANNING:

- a. **No Impact.** The project involves the development of a WCF on a lot that has been previously developed and is currently being used as a vehicle storage lot. The property to the south of the subject site is designated as open space. The project does not have the potential to physically divide an established community. No impact would occur.
- b. **No Impact.** The project site is located in an area that is zoned Planned Community 7 (PC-7) – South Poway Business Park with a Light Industrial/Outdoor Storage land use designation where wireless communication facilities are permitted as a conditional use. The maximum height for a freestanding wireless tower in the PC-7 zone is 45 feet. The proposed 85'6" tall cell tower does not comply with current zoning regulations. However, the existing height standard was not adopted to mitigate an environmental impact. A Specific Plan Amendment is proposed in conjunction with the Conditional Use Permit for the wireless communication facility (WCF) that would allow WCFs to have a maximum height of 90 feet. If the Specific Plan Amendment is approved, the proposed cell tower would be consistent with zoning regulations. No impact would occur.

XII. MINERAL RESOURCES:

- a&b. **No Impact.** Pursuant to the City of Poway Master Environmental Assessment prepared in conjunction with the update to the Poway General Plan in 1991, there are no known mineral resources on the site. Additionally, the site has been previously developed and the proposed WCF is located in an existing landscape planter. No impacts would occur.

XIII. NOISE:

- a. **Less Than Significant Impact.** The project is the construction of a WCF and the installation of ornamental landscaping. The project will result in temporary noise increases that are associated with periodic generator testing or use of a generator in the event of a power outage. Noise from standard operation of the WCF is minimal and will be less than significant.
- b. **Less Than Significant Impact.** The project construction activities will result in temporary or periodic increases in the generation of excessive ground borne vibration or ground borne noise levels typically related to construction. Per City standards, the noise generating construction activities are limited to certain times of the day and days of the week. A less than significant impact could occur.
- c. **No Impact.** The project site is not located within the vicinity of a private airstrip or an airport land use plan, or within two miles of a public airport. The closest airports to the project site are Marine Corps Air Station Miramar, located approximately 6.5 miles southwest of the project site and Gillespie Field, located approximately 10 miles

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southeast of the project site. Thus, the project would not expose people residing or working in the project area to excessive noise levels no impact would occur. No impact would occur.

XIV. POPULATION AND HOUSING:

- a & b. **No Impact.** The proposed WCF is located on a previously developed lot and does not consist of any residential uses. Residential uses are not permitted in the Light Industrial/Outside Storage land use designation for the subject property. The project will not induce growth indirectly as there is existing infrastructure within the project vicinity. Additionally, no people or housing will be displaced as the project will be constructed within an existing landscape planter. Therefore, no impact would occur.

XV. PUBLIC SERVICES:

- a.i. **Fire Protection – No Impact.** The project site is served by the City of Poway Fire Department. The site is already included within the Fire Department service area. Any specific service provided should there be an (unexpected) emergency call to this project is accounted for. No new or upgraded fire protection facilities would be required as a result of establishment of this project and no physical impacts resulting from construction of new facilities are identified. A less than significant impact would occur.
- a.ii. **Police Protection – No Impact.** The City of Poway contracts with the San Diego County Sheriff's Department for law enforcement services. The project site is currently served by the Poway Station, which is located at 13100 Bowron Road. The site is included within the Sheriff's service area. Any specific service provided should there be an (unexpected) emergency call to the site is accounted for. No new or upgraded police protection facilities would be required as a result of establishment of this project and no physical impacts resulting from construction of new facilities are identified. A less than significant impact would occur.
- a.iii. **Schools – No Impact.** The proposed WCF will not generate the need for additional school facilities as no new residents would be associated with the project. No impact would occur.
- a.iv. **Parks – No Impact.** The proposed WCF will not generate the need for additional park space as no new residents would be associated with the project. No impact would occur.
- a.v. **Other Public Facilities – No Impact.** The project would not result in an increase in the need for use of public facilities or service or necessitate any physical alterations to public facilities. Additional landscaping associated with the project would be irrigated from an existing recycled water system. No impact would occur.

XVI. RECREATION:

- a & b. **No Impact.** The project involves the construction of a wireless communication facility with no recreation facilities proposed. This would not result in an increase in use of neighborhood and regional parks or other recreational facilities. No impact would occur.

XVII. TRANSPORTATION:

- a. **No Impact.** The project will not conflict with a program plan, ordinance or policy addressing the circulation system, including roadway, bicycle and pedestrian facilities. When operational, the proposed WCF will not require any employees to be onsite except

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for a monthly maintenance visit. Therefore, the project will result in a minimal increase in traffic. No impact would occur.

- b. **No Impact.** The proposed WCF will not require any employees to be onsite except for a monthly maintenance visit. It will not be in conflict or inconsistent with the California Environmental Quality Act Guidelines Section 15064.3, subdivision (b). No impact would occur.
- c. **No Impact.** The proposed WCF will not increase and hazards due to a geometric design feature as there are no proposed roads or right-of-way improvements associated with the project. Additionally, the cellular tower is setback over 97 feet from the adjacent roadway (Kirkham Way) and will not obstruct the line of site for motorists. No impact will occur.
- d. **No Impact.** The proposed WCF will be located in an existing landscape planter on a previously developed site and will not affect emergency access to the site. No impact would occur.

XVIII. TRIBAL CULTURAL RESOURCES:

- a.i. **No Impact.** The project site is not on a “Local register of historical resources” and is not officially designated or recognized as historically significant by Poway. No impact would occur.
- a.ii. **Less than Significant.** See V.b and V.c.

The City of Poway sent a formal Tribal Notification to the Native American contact list that was provided by the Native American Heritage Commission on August 16, 2019 in accordance with Public Resources Code Section 21080.3.1(b). The Viejas Band of Kumeyaay Indians (Viejas Band) requested consultation on the project and the Viejas Band requested to have a tribal monitor onsite during ground disturbing activities which will be included as a condition of approval for the project. Therefore, a less than significant impact would occur.

XIX. UTILITIES AND SERVICE SYSTEMS:

- a - e. **No Impact.** The project involves the construction of a WCF that will not require employees to be onsite except for a monthly maintenance visit which will not require the use of water, produce waste wastewater, or solid waste. Further, the landscaping that will be installed will utilize recycled water from an existing irrigation system on the previously developed property. No impact will occur.

XX. WILDFIRE:

- a. **No Impact.** See Section XV.a.i. (Public Services – Fire Protection).
- b. **No Impact.** The proposed WCF will not require any employees to be onsite except for a monthly maintenance visit and therefore will not expose any occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact will occur.

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- c. **No Impact.** The proposed WCF would not require the installation or maintenance of infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment. No impact will occur.
- d. **No Impact.** The proposed WCF is located such that it would not be exposed to downslope or downstream flooding or landslides. The project site is located in an area that is not prone to flooding. Additionally, the project will not be altering drainage patterns on the site because it will be built within an existing landscape planter with no grade changes proposed. No impact will occur.

XXI. MANDATORY FINDING OF SIGNIFICANCE:

- a. **No Impact.** The proposed WCF will be located in an existing landscape planter on a previously developed lot and does not 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 or major periods of California history or prehistory.
- b. **Less Than Significant.** The proposed WCF does not have cumulatively considerable impacts as the nearest structure that is over the maximum allowable height are two utility transmission poles that are approximately 568 feet and 628 away from the proposed cellular tower. There are no cellular towers proposed currently and no additional towers are expected to be proposed within the area because the subject WCF will allow for up to two additional wireless carriers to co-locate onto the cellular tower. The proposed Specific Plan Amendment would allow for additional freestanding cellular towers to be up 90-feet tall. Each proposed cellular tower in the future would require approval of a Conditional Use Permit to be approved by the City Council and environmental impacts of each tower would be analyzed by City staff and the City Council with the opportunity for review and comment by the public.
- c. **No Impact.** Sections I through XX of this Initial Study provide an analysis of potential environmental impacts of the Project, including adverse effect on human beings. The proposed Project would construct an unmanned wireless cell tower on private land owned by the City of Poway through a lease agreement. It was primarily determined that there would be no impacts and any impacts that would occur would be temporary during construction.