

# WASTE MANAGEMENT PLAN

## University Self Storage

5150 University Avenue

### Submitted to:

City of San Diego  
Environmental Services Department  
9601 Ridgehaven Court, Suite 320  
San Diego, California 92123

### Prepared by:

HWL Planning & Engineering  
Contact: Sally Schifman, Senior Planner; (760) 953-8566  
2888 Loker Avenue East, Suite 217  
Carlsbad, California 92010

### Prepared on behalf of:

University Storage, LLC  
15260 Ventura Boulevard, Suite 1120  
Sherman Oaks, California 91403

Project No. 682266

~~May~~ August 2023



# TABLE OF CONTENTS

1.0 INTRODUCTION.....	1
1.1 EXISTING CONDITIONS.....	1
1.2 PROPOSED PROJECT.....	3
1.3 PURPOSE OF THE WASTE MANAGEMENT PLAN .....	9
2.0 REGULATORY FRAMEWORK.....	10
2.1 FEDERAL .....	10
2.2 STATE .....	10
2.3 LOCAL.....	11
2.4 BACKGROUND .....	13
3.0 DEMOLITION, GRADING, & CONSTRUCTION WASTE GENERATED.....	17
3.1 DEMOLITION PHASE.....	17
3.2 GRADING PHASE .....	18
3.3 CONSTRUCTION PHASE.....	19
4.0 OPERATIONS WASTE GENERATED .....	22
4.1 OCCUPANCY PHASE .....	22
5.0 WASTE REDUCTION RECOMMENDATIONS.....	23
5.1 DEMOLITION WASTE REDUCTION .....	23
5.2 GRADING WASTE REDUCTION .....	24
5.3 CONSTRUCTION WASTE REDUCTION .....	27
5.4 OPERATIONS WASTE REDUCTION .....	29
6.0 CONCLUSIONS.....	31
7.0 REFERENCES .....	33

## TABLES

Table 1: C&D Debris Deposit Table .....	13
Table 2: Minimum Material Storage Areas for Nonresidential Development .....	16
Table 3: Demolition Phase – Waste Generation and Diversion .....	18
Table 4: Grading Phase – Waste Generation and Diversion.....	19
Table 5: Construction Phase – Waste Generation and Diversion.....	21
Table 6: Occupancy Phase – Waste Generation and Diversion.....	22
Table 7: Total Waste Generated, Diverted, and Disposed of by Phase.....	32

## FIGURES

Figure 1: Location Map .....	2
Figure 2: Site Plan .....	4
Figure 3: Basement Floor Plan .....	5
Figure 4: First Level Floor Plan .....	6
Figure 5: Second Level Floor Plan .....	7
Figure 6: Former UST Site Locations .....	15

## ATTACHMENTS

Attachment A: Solid Waste Calculations.....	35
---	----

# 1.0 INTRODUCTION

HWL Planning and Engineering (HWL), on behalf of University Storage, LLC (applicant), has prepared this Waste Management Plan (WMP) for the University Self Storage Project (project) in the City of San Diego (City) to analyze the solid waste impacts that are anticipated during construction and operation of the project. Our objective is to provide acceptable recommendations to reduce potential impacts from implementation of the project on solid waste services. In accordance with Assembly Bill 341, the goal is to reduce the tons of disposed waste to 60 tons or less, or to provide diversion of 75 percent or more.

## 1.1 EXISTING CONDITIONS

### 1.1.1 PROJECT LOCATION

The project is located at 5150 University Avenue, San Diego, California 92105, directly northwest of the intersection of University Avenue and 52<sup>nd</sup> Street (APN 472-383-04-00). The project site consists of approximately 2.17 acres located at the former San Diego Rescue Homeless Center in southeast San Diego. The site location is displayed in Figure 1: Location Map.

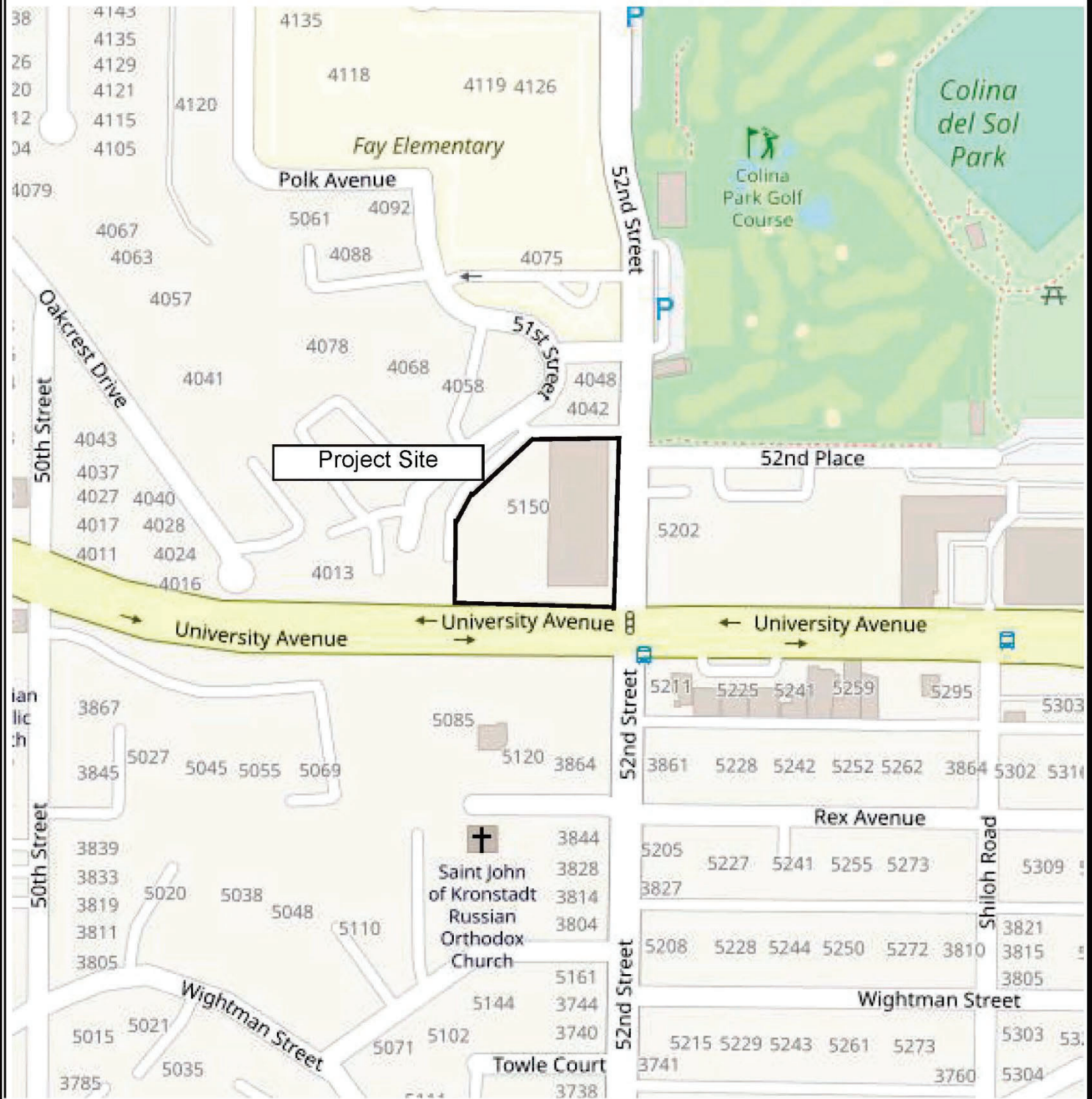
The project site is zoned Commercial-Community 5-4 (CC-5-4) and is located within the City Heights Community Plan District of the Mid-City Communities Plan. The City's Development Services Department has determined that the Project is a permitted use in the CC-5-4 zone and is consistent with the land use designation identified in the land use plan for the City Heights Community Plan District.

### 1.1.2 SURROUNDING LAND USES

The project area is generally located north of University Avenue, east of 51<sup>st</sup> Street, south of Nando's Hauling and Demolition, and west of 52<sup>nd</sup> Street. The site is bordered on the north and west by residential properties (zoned RM-1-3: Residential-Multiple Unit). Colina del Sol Park and Colina Golf Course are located northeast of the project site (zoned OP-1-1: Open Space – Developed/Active Park). The San Diego County Department of Public Health office (zoned CC 5-3: Commercial-Community) is located directly south of Colina del Sol Park and east of the project site. Various commercial businesses, restaurants, and retailers (zoned CC 5-3: Commercial-Community) are located south of the project site, across University Avenue. Further south of the adjacent commercial uses are residential uses of various densities (zoned RM-1-2, RM-1-3, RM-2-5: Residential Multiple Unit<sup>1</sup> and RS-1-7: Residential Single Unit).

---

<sup>1</sup> RM-1-2 permits a maximum density of one dwelling unit for each 2,500 square feet of lot area. RM-1-3 permits a maximum density of one dwelling unit for each 2,000 SF of lot area. RM-2-5 permits a maximum density of one dwelling unit for each 1,500 square feet of lot area.



# Figure 1: Location Map

Source: Weis Environmental, August 2019



## 1.2 PROPOSED PROJECT

The proposed project would involve development of a two-story, 1,120-unit, self-storage facility with a full basement, totaling approximately 140,000 square feet (SF) on 2.17 acres. The project would include 17 parking stalls. The building would include two approximately 46,300 SF stories (1<sup>st</sup> and 2<sup>nd</sup> floors) and a 47,331 SF basement. The first floor would include 861 SF of lobby/office space, an employee break room, and restroom facilities. See Figure 2: Site Plan and Figure 3 through Figure 5 for floor plans.

### 1.2.1 ACCESS, CIRCULATION, AND PARKING

Project facilities would be accessed by the existing shared ingress/egress drive aisle along 52<sup>nd</sup> Street as well as a newly constructed shared drive aisle along 51<sup>st</sup> Street. The drive aisles would lead to a single parking area located to west and north of the proposed self-storage facility to be used by tenants and employees. Tenant access to and from the facility would be controlled by two security gates with a keypad entry system.

Loading dock and overhead door screening regulations contained within SDMC Section 142.1030 would not apply to the proposed project. Consequently, building loading and access would be provided through storefront glass doors located at the rear of the building within the proposed parking area.

The project would provide a total of 17 vehicle parking stalls, including 14 standard stalls, one electric vehicle (EV) capable parking stall, and one clean air/vanpool EV stall. Three motorcycle parking stalls would be included, as well as a short-term bicycle rack that could support up to 15 bicycles. Additionally, one long-term bicycle locker would be located within the storage facility on the building's first floor.

### 1.2.2 LANDSCAPING AND SIGNAGE

The project would include new landscaping features on the eastern and western perimeters of the site. Consistent with the existing City slope easement that exists on the southern boundary of the project site, the project would also implement landscaping improvements and new landscaping along the University Avenue frontage. Generally, all proposed landscaping would consist of drought-tolerant, native species in compliance with San Diego Municipal Code (SDMC) Chapter 14, Division 4, Article 2: Landscape Regulations.

Signage and address identification will be provided for the new building in a location that is plainly visible and legible from the street or road fronting the property. Where access is by way of a private road and the building address cannot be viewed from the public way, an approved sign or means will be used to identify the structure. All signage proposed for the structure will be consistent with Chapter 14, Article 2, Division 12: Sign Regulations, of the SDMC.

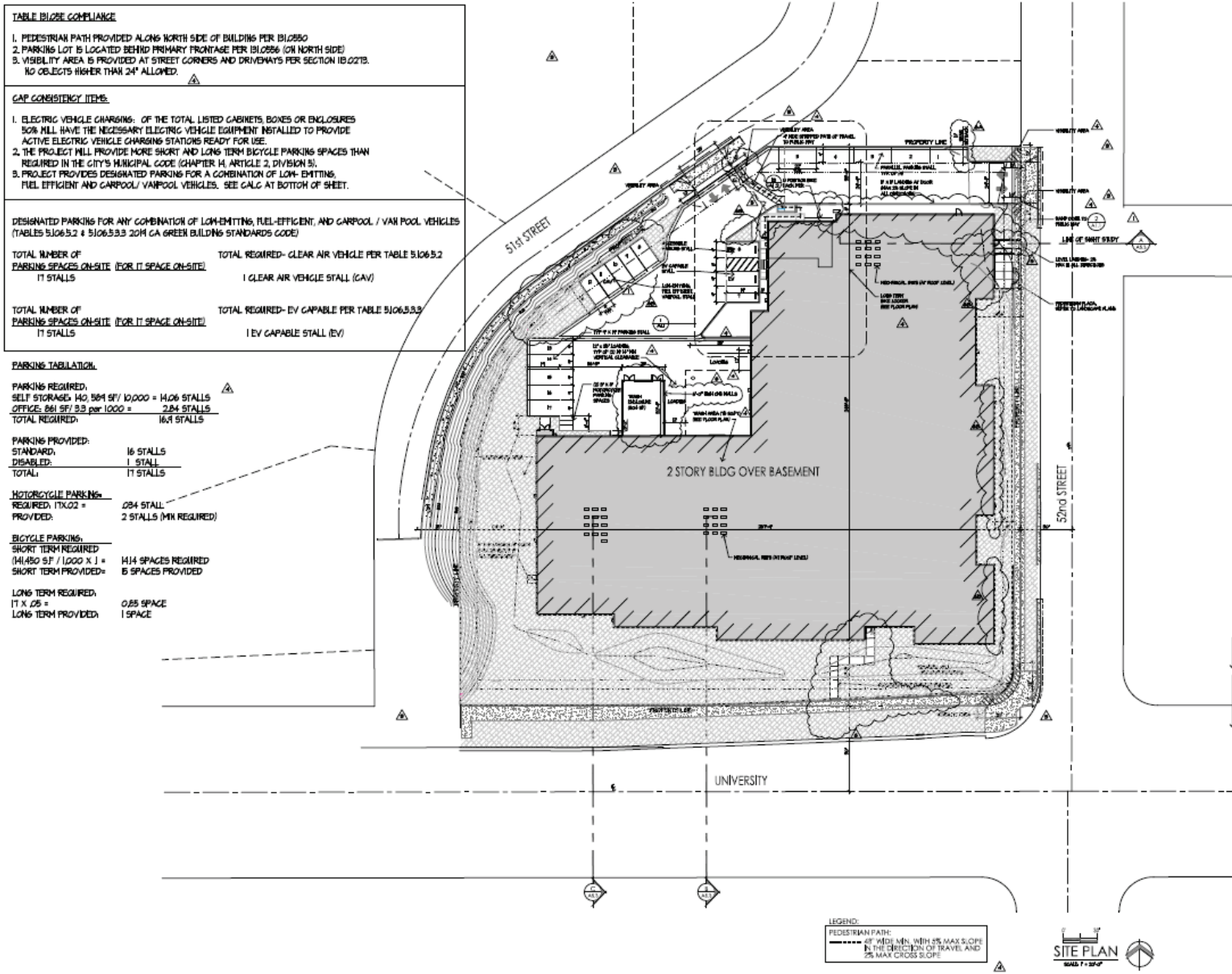


Figure 2: Site Plan







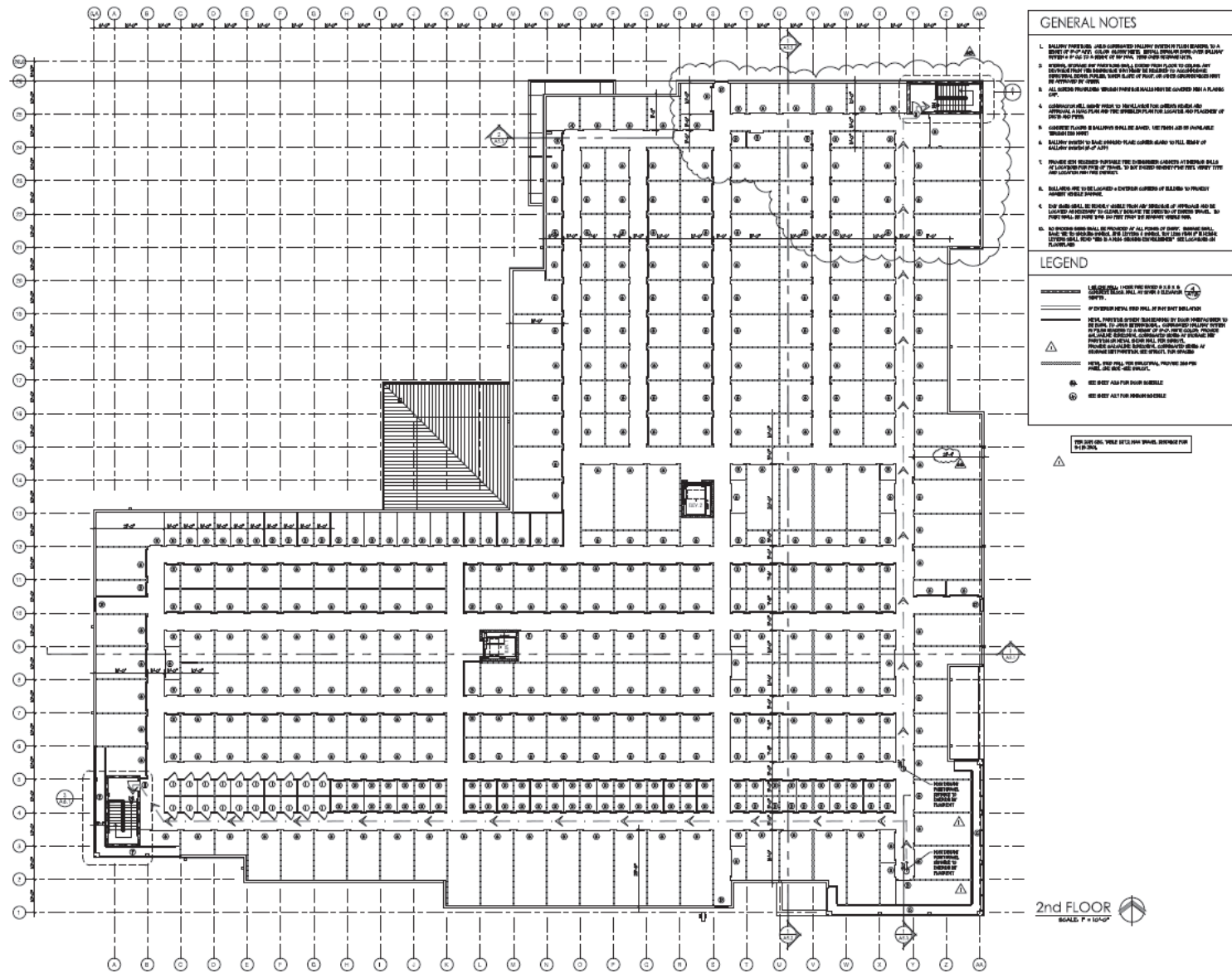


Figure 5: Second Level Floor Plan

Waste Management Plan – University Self Storage

5150 University Avenue  
PN 682266

### 1.2.3 GRADING AND STORMWATER TREATMENT

Development of the site would include grading 2.11 acres (97 percent of total site) to a maximum depth of 15 feet for basement foundations. Grading quantities are estimated to be a total of 29,200 cubic yards (cy) of cut (including 5,800 cy of petroleum hydrocarbon impacted soils) and 105 cy of fill, for a total export of 29,095 cy of soil.

Storm water retention would be accomplished through a combination of underground infiltration and aboveground drainage infrastructure which feeds to a new modular wetland system and underground storage system located beneath the parking area. Additionally, catch basins and storm drain cleanouts would be placed along the perimeter of the project site within the proposed landscaped areas and parking area.

### 1.2.4 UTILITIES AND INFRASTRUCTURE

The proposed project would connect to existing water, wastewater, storm drainage, and electrical infrastructure. Water service, wastewater treatment, storm water drainage system, and solid waste collection are provided by the City. Electricity and natural gas are provided by San Diego Gas & Electric. The Applicant would install new water lines, sewer, and underground electrical utilities within the site. The proposed wetland modification area beneath the surface parking area would meter runoff and direct the water into a new stormwater storage system that would convey into existing and proposed storm drains.

### 1.2.5 PROJECT OPERATIONS

The self-storage facility would be open for customer access between 8:00 AM and 8:00 PM, seven days a week. The administrative office would be open from 9:00 AM to 6:00 PM Monday through Saturday, and 10:00 AM to 2:00 PM on Sundays. The business would be supported by up to four full-time employees, with one to two employees on shift at a given time.

As stated in the standard storage rental agreement between the Owner and Tenant, use of the property by tenants is limited to the storage of stored property only. The tenant is strictly prohibited from storing, using, or bringing materials on or onto the premises which are classified hazardous or toxic under any law or regulation, and from engaging in any activity on the premises which produces, or may produce such materials. The tenant's obligations of indemnity specifically include any costs, expenses, fines, or penalties imposed against the Owner, or which may be imposed against the Owner in any portion, or arising out of storage or presence, or alleged storage or presence of any materials in violation of the storage rental agreement. Foodstuffs, trash, garbage, or discarded materials will not be allowed to be thrown away in or near the stored property or otherwise on the premises.

### 1.2.6 CONSTRUCTION SCHEDULE

The University Self Storage Project will be developed in one phase over 18 months. The project is expected to obtain entitlements in late 2023, with construction beginning in mid-2024 and

ending in early 2026. It is anticipated that a Certificate of Occupancy would be granted in early 2026.

### 1.3 PURPOSE OF THE WASTE MANAGEMENT PLAN

This WMP has been developed to address the phases of site development that will require proper waste management: the Demolition Phase, Grading Phase, Construction Phase, and Occupancy Phase (post-construction). For each phase, this WMP addresses the projected amount of waste that could be generated by the project based on City generation rates and estimates; waste reduction goals; and recommended techniques to achieve the waste reduction goals, such as reducing, reusing, and recycling. Waste disposal sites, recycling methods, and opportunities may change from those available today; however, it is not expected that waste diversion and disposal sites listed in this WMP would change by the time the project is anticipated to begin construction.

The direct impact threshold of significance for projects in the City of San Diego is 1,500 tons of waste per year, which would likely occur when developments are over 1 million square feet. Projects that generate more than 60 tons of waste per year would have the potential to result in a cumulative impact on solid waste services and are required to prepare a WMP to demonstrate how the project would reduce solid waste impacts to below a level of significance.

The disposal sites and recycling facilities designated in this plan, or alternate facilities listed on the Environmental Services Department's (ESD) website that achieved a comparable diversion rate, shall be used during project development. A facility (or facilities) substituted must not affect the overall diversion rate of the project. More specifically, for each project phase, the WMP includes the following:

- Tons of waste anticipated to be generated.
- Material/type and amount of waste anticipated to be diverted.
- Project features that would reduce the amount of waste generated.
- Project features that would divert or limit the generation of waste.
- Source separation techniques for waste generated.
- How materials shall be reused on-site.
- Name and location of recycling, reuse, or landfill facilities where waste shall be taken.

## 2.0 REGULATORY FRAMEWORK

### 2.1 FEDERAL

#### 2.1.1 HAZARDOUS MATERIALS TRANSPORTATION ACT

The transportation of hazardous materials is regulated by the Hazardous Materials Transportation Act (HMTA), which is administered by the Research and Special Programs Administration of the U.S. Department of Transportation (DOT). HMTA provides DOT with a broad mandate to regulate the transport of hazardous materials, with the purpose of adequately protecting the nation against risk to life and property that is inherent in the commercial transportation of hazardous materials. The HMTA governs the safe transportation of hazardous materials by all modes, excluding bulk transportation by water. DOT regulations that govern the transportation of hazardous materials are applicable to any person who transports, ships, causes to be transported or shipped, or is involved in any way with the manufacture or testing of hazardous materials packaging or containers. DOT regulations pertaining to the actual movement govern every aspect of the movement, including packaging, handling, labeling, marking, placarding, operational standards, and highway routing.

### 2.2 STATE

#### 2.2.1 CALIFORNIA INTEGRATED WASTE MANAGEMENT ACT (ASSEMBLY BILL 939)

In 1989, the California Legislature passed Assembly Bill (AB) 939: Integrated Waste Management Act, which mandated that all cities reduce waste disposed in landfills from generators within their borders by 50 percent by the year 2000. AB 939 required all local governments to prepare a Source Reduction and Recycling Element, which incorporates waste management policies and programs to achieve the mandated waste reduction. Since 2004, the City of San Diego has diverted more than 50 percent of its generated waste stream from disposal.

#### 2.2.2 SOLID WASTE DISPOSAL MEASUREMENT ACT (SENATE BILL 1016)

In 2008, Senate Bill (SB) 1016 was chaptered. Known as the Solid Waste Disposal Measurement Act, SB 1016 maintained the 50 percent diversion requirement of AB 939, but changed to a disposal-based measurement system, expressed as the 50 Percent Equivalent Per Capita Disposal Target. This built upon AB 939 by implementing a simplified and timelier indicator of jurisdiction performance that focuses on reported disposal at Board-permitted disposal facilities. This established a goal of not recycling more but disposing of less.

#### 2.2.3 CALIFORNIA SOLID WASTE: DIVERSION (ASSEMBLY BILL 341)

AB 341, adopted in 2011, amended AB 939 by making a legislative declaration that it is the policy goal of the State of California that not less than 75 percent of solid waste generated be

reduced, recycled, or composted by the year 2020. While a policy goal may not be legally enforceable, city and/or county ordinances and other mechanisms make AB 341 provisions enforceable within their jurisdictions. AB 341 also required a business (defined to include a commercial or public entity) that generates more than eight cy of commercial solid waste per week or is a multifamily residential dwelling of five units or more to arrange for recycling services, starting July 1, 2012.

#### 2.2.4 SHORT-LIVED CLIMATE POLLUTANTS (SLCP): ORGANIC WASTE METHANE EMISSIONS REDUCTIONS (SENATE BILL 1383)

In September 2016, Governor Brown signed into law SB 1383, establishing methane emissions reduction targets in a statewide effort to reduce emissions, or short-lived climate pollutants (SLCP) in various sectors of California’s economy. The new law codifies the California Air Resources Board’s Short-Lived Climate Pollutant Reduction Strategy, established pursuant to SB 605, to achieve reductions in the statement emissions to short-lived climate pollutants. Actions to reduce short-lived climate pollutants are essential to address the many impacts to climate change on human health, especially in California’s most at-risk communities, and on the environment.

SB 1383 went into effect on January 1, 2022 and requires the reduction of organic waste disposed of in landfills. Organic waste is food scraps and food-soiled paper from kitchens and food operations, yard waste such as garden and landscape waste, organic textiles and carpets, and wood waste. The target goal is to collect and divert at least 50 percent, and up to 75 percent (beginning in 2025), of organic waste from project sites to recycling and composting facilities.

### 2.3 LOCAL

#### 2.3.1 CITY OF SAN DIEGO GENERAL PLAN

The City of San Diego General Plan Public Facilities, Services, and Safety Element contains goals and policies related to the provision of public services within its city limits. Applicable policies include those listed below.

#### 2.3.2 CITY OF SAN DIEGO ZERO WASTE PLAN: ROAD TO ZERO WASTE, NEXT STOP 75 PERCENT

State of California regulations for solid waste (California Public Resources Code, Section 41700 et seq.) require that each region have a plan with adequate capacity to manage or dispose of solid waste for at least 15 years into the future. The City of San Diego’s Zero Waste Plan establishes goals to target 75 percent diversion by 2020, 90 percent diversion by 2035, and “zero” by 2040 and outlines potential diversion strategies to help the City achieve these goals.

#### 2.3.3 CITY OF SAN DIEGO MUNICIPAL CODE

The City is required to divert at least 50 percent of its solid waste from landfill disposal through source reduction, recycling, composting, and transformation and it is the policy goal of the

State that not less than 75 percent of solid waste generated be reduced, recycled, or composted. The City has enacted codes and policies aimed at helping the City to achieve this diversion level, including the Refuse and Recyclable Materials Storage Regulations (San Diego Municipal Code [SDMC] Chapter 14, Article 2 Division 8), Recycling Ordinance (SDMC Chapter 6, Article 6, Division 7), and the Construction and Demolition (C & D) Debris Deposit Ordinance (SDMC Chapter 6, Article 6, Division 6). These statutes designate refuse and recycling space allocation requirements for on-site refuse and recyclable material storage requirements, diversion of construction and demolition debris regulations, and diversion of recyclable materials generated from residential and commercial facilities.

#### 2.3.4 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The City of San Diego California Environmental Quality Act (CEQA) Significance Determination Thresholds (City of San Diego, 2016a) have established a threshold of 40,000 square feet of renovation, demolition, or construction as generating sufficient waste (e.g., 60 tons) to have a potentially cumulative significant impact on solid waste services. According to the City's CEQA Significance Determination Thresholds, projects that are 1,000,000 square feet or more generating sufficient waste (e.g., 1,500 tons) have potentially significant direct impacts on solid waste services and facilities.

#### 2.3.3 CITY REDUCTION STRATEGIES

##### RECYCLING ORDINANCE

The City Recycling Ordinance is found in SDMC Section 66.0701 et. seq. It requires the provision of recycling service for all single-family residences; and commercial facilities and multifamily residences with service for four cy or more. In addition, the ordinance requires development of educational materials to ensure occupants are informed about the City's ordinance and recycling services including information on types of recyclable materials accepted.

##### ORGANIC WASTE COLLECTION

Starting in 2022, the City and City-certified private waste haulers will expand organic waste collection services for residents and businesses. Food and yard waste collected will be recycled using:

- Composting facilities that make soil amendments, materials that are added to soil to change and improve it.
- Anaerobic digestion facilities, technology and microorganisms break down organic waste in closed spaces where there is no oxygen and create renewable natural gas.

SB 1383 requires extensive procedural changes and significant coordination amongst various stakeholders. The City of San Diego is in the process of developing collection operations, amending agreements with non-exclusive franchise haulers, amending the SDMC, enacting building requirements, preparing enforcement responsibilities, and strategizing public education and outreach efforts. Participation in the new organic waste recycling program is

vital and will help protect California's environment and economy from the impacts of climate change.

CONSTRUCTION AND DEMOLITION (C&D) DEBRIS DIVERSION DEPOSIT PROGRAM

The C&D Debris Diversion Deposit Program (SDMC Section 66.0601 et seq.) applies to all applicants for building, demolition, and removal permits. This ordinance requires that the applicant post a deposit (Table 1: C&D Debris Deposit Table). The deposit is not returned until the applicant demonstrates that a minimum amount 50 percent of the material generated has been diverted from disposal in landfills.

**Table 1: C&D Debris Deposit Table**

Building Category	Sq. Ft. Subject Ordinance*	Deposit per Sq. Ft.	Range of Deposits
Residential New Construction, Non-residential Alterations, Demolition	1,000-100,000	\$0.40	\$400-\$40,000
<b>Non-Residential New Construction</b>	<b>1,000-50,000</b>	<b>\$0.20</b>	<b>\$200-\$10,000</b>
Flat Rate			
Residential Alterations	1,000-6,999	-	\$1,000
Source: City 2016b			
*Sq. Ft. = square feet; Deposit amounts are applied to the entire area(s) where work will be performed and are calculated based on square footage.			

Mixed construction debris recycling facilities in San Diego are evaluated quarterly to determine how much of the throughput is recycled, and how much is a “residual” material requiring disposal. Facilities that accept mixed debris typically achieve a 50 to 70 percent or less diversion rate. Single materials recyclers, such as metal recyclers, often achieve a nearly 100 percent diversion rate. When comingled materials are sent to a mixed facility, the 75 percent diversion goal established by AB 341 will not be met. Depending on the project, and to ensure that the overall diversion goal is attained, some materials must often be separated and trucked to facilities with higher diversion rates, such as aggregate and metal recyclers.

In San Diego County there are three large solid waste landfills, Miramar, Sycamore, and Otay. Two of the three landfills, Miramar, and Sycamore are located within the City of San Diego. The City of San Diego operates Miramar, while the other two large landfills are operated by a company locally known as Allied, and nationally known as Republic.

**2.4 BACKGROUND**

**2.4.1 SITE CHARACTERISTICS AND HISTORY**

The project site was formerly occupied by the San Diego Rescue Mission and was used for office and storage/warehousing purposes. Items stored at the property primarily included non-perishable goods (i.e., furniture, clothing, home decorating items, etc.). Perishable item storage



and sales were also conducted on the northern portion of the property. A two-story office/warehouse building was present in the southeastern portion of the site. An adjoining metal-framed warehouse structure was situated in the northeastern portion of the project site. Remaining portions of the site consisted of an asphalt-paved parking lot, concrete flatwork, and minimally landscaped areas.

An existing 10-inch City-managed storm drain easement traverses the project site from east-west which would be modified during construction. An existing 8-inch City-managed sewer easement traverses the project site from northeast-southeast and would be vacated to implement the project. Additionally, two existing easements are planned for removal, including one City-managed slope easement and one 10-inch San Diego Gas & Electric easement, both located at the southern boundary of the project site.

The existing structures were demolished in March 2021. Currently, the 2.17-acre project site is vacant and only contains perimeter fencing and landscaping along the 51<sup>st</sup> Street, 52<sup>nd</sup> Street, and University Avenue frontages.

Prior Phase I and II Environmental Site Assessments (ESA) were completed by Advantage Environment Consultants, LLC (AEC) in April 2008, August 2008, and again in August 2019, during transfer of property ownership by Weiss Environmental, LLC. Results of the ESAs indicate that two underground storage tanks (USTs) were formerly present at the site, as shown in Figure 6.

Releases of petroleum hydrocarbons to the subsurface occurred in both tank areas. The releases were assessed under the regulatory oversight of the County of San Diego Department of Environmental Health and Quality (DEHQ). The DEHQ closed the cases for the tanks upon adequate delineation of the impacts on October 13, 1998 (County of San Diego 1998a; 1998b). The closure letters for the tank releases state that the corrective actions would need to be reviewed if the commercial/industrial land use were to change or if a structure were to be planned within the immediate vicinity of the southern UST.

There are documented residual petroleum hydrocarbon impacts near both former USTs. However, the impacts are limited in extent relative to the overall acreage of the site. Prior residual impacts from the northern UST were not encountered until a depth of 20 feet below existing grades (bgs). Therefore, residual impacts are not anticipated during grading activities near this former tank. The southern UST area is situated within the future basement area, with prior residual impacts encountered at shallower depths (five feet bgs). As such, petroleum-impacted soil is expected during basement excavation.

-  Site Boundary
-  Proposed Development
-  Proposed Lower Level
-  Former SDRM Building

 Approximate Location of Former Northern UST

Approximate Location of Former Southern UST 

**51<sup>st</sup> STREET**

**52<sup>st</sup> STREET**

**UNIVERSITY AVENUE**



# Figure 6: Former UST Site Locations

Source: Weis Environmental, August 2019



As indicated in the DEHQ closure letters, any impacted soil encountered during construction activities would require proper handling. In anticipation of this requirement, a Soil Management Plan (SMP) was prepared by Weis Environmental (September 28,2020) to affirm the protection of human health during proposed grading activities and to complete contaminant source removal activities within the construction footprint for the new site development. Based on the data obtained during the 2008 Phase II ESA, the petroleum-impacted soil will likely be profiled as a non-hazardous waste when removed from the site and disposed of at an appropriate offsite facility.

#### 2.4.2 EXTERIOR REFUSE, ORGANIC WASTE AND RECYCLABLE MATERIAL STORAGE REGULATIONS

Exterior refuse, organic waste, and recyclable material storage areas will be provided in accordance with SDMC Chapter 14, Article 2, Division 8: Refuse and Recyclable Material Storage Regulations, Sections 142.0810, 142.0830, and 142.0831. Table 2: Minimum Material Storage Areas for Nonresidential Development, shows the required storage area applicable to the project.

As discussed within Section 1.2.5 Project Operations, the project would not allow tenants or visitors to dispose of waste onsite. All refuse bins would be for management use only and would be locked within a separate trash enclosure space. However, as required by SDMC, the project would provide a total of 864 SF of trash enclosure space provided both within the building and near the loading zone within the eastern portion of the parking lot.

**Table 2: Minimum Material Storage Areas for Nonresidential Development**

Gross Floor Area (Square Feet [SF]) <sup>1</sup>	Minimum Refuse Storage Area (SF)	Minimum Recyclable Material Storage Area (SF)	Minimum Organic Waste Storage Area (SF)	Total Minimum Storage Area (SF)
0-5,000	12	12	12	36
5,001-10,000	24	24	24	72
10,001-25,000	48	48	48	144
25,001-50,000	96	96	96	288
50,001-75,000	144	144	144	432
75,001-100,000	192	192	192	576
<b>100,001+</b>	<b>192 plus 48 SF for every 25,000 SF of building area above 100,001</b>	<b>192 plus 48 SF for every 25,000 SF of building area above 100,001</b>	<b>192 plus 48 SF for every 25,000 SF of building area above 100,001</b>	<b>576 plus 144 SF for every 25,000 SF of building area above 100,001</b>

Source: City of San Diego Municipal Code, Chapter 14, Article 2, Division 8: Refuse, Organic Waste, and Recyclable Material Storage Regulations, effective February 26, 2022.

<sup>1</sup> The storage rental agreement restricts foodstuffs, trash, garbage, or discarded materials from being thrown away in or near the stored property or otherwise on the premises. Therefore, only the office area (approximately 861 SF) is anticipated to generate refuse/recyclable/organic waste. An indoor waste storage

Gross Floor Area (Square Feet [SF]) <sup>1</sup>	Minimum Refuse Storage Area (SF)	Minimum Recyclable Material Storage Area (SF)	Minimum Organic Waste Storage Area (SF)	Total Minimum Storage Area (SF)
area of 56.25 SF will be provided as refuse/recyclable/organic waste storage area to accommodate the waste generation by employees.				

### 3.0 DEMOLITION, GRADING, & CONSTRUCTION WASTE GENERATED

Site preparation is anticipated to begin in mid-2024, with concrete removal, grading/earthwork, and construction taking place over a period of approximately 18 months. Construction practices will comply with federal, State, and local regulations regarding handling of building materials to ensure waste minimization requirements are met.

Different land uses generate different amounts of solid waste. For example, a car rental agency generates a different type and volume of waste than does a fast-food restaurant. Some government agencies provide waste generation numbers specific to Standard Industrial Classification (SIC) codes. However, even within SIC codes, waste generation rates and composition may vary.

Because waste management is a costly service, efficient managers closely estimate waste generation, and take steps to reduce waste at its source. When specific information is available regarding waste generation, this information may be used in Waste Management Plans, provided the rates are within accepted standards. However, when managers/project proponents do not know specifics about waste generation rates, estimates may be used. As a rule of thumb, three or more pounds per square foot of waste are generated during demolition, construction, and also per year during ongoing use of a site (i.e., operation).

#### 3.1 DEMOLITION PHASE

The project site is currently vacant and therefore, no waste will be generated due to building demolition. However, there will be approximately 2,354 tons of waste generated during the removal of the remaining onsite asphalt and concrete from the parking lot associated with the prior land use, old landscaping or plant materials, and any garbage that may have accumulated on the site. Approximately 2,347 tons, or 99.8 percent, of the material will be diverted, while approximately 5 tons, or 0.2 percent, of debris will be disposed in a landfill, to include non-usable materials and miscellaneous trash. Table 3 summarizes the type and quantity of materials, as well as diversion/disposal totals, anticipated during the demolition phase.

**Table 3: Demolition Phase – Waste Generation and Diversion**

Material Type	Estimated Waste Quantity (tons)	Handling	Estimated Diversion (tons)	Estimated Disposal (tons)
Asphalt and Concrete	2,320	<b>Hanson Aggregates</b> 9229 Harris Plant Road San Diego, CA 92126 (100% Diversion)	2,320	0
Landscape Materials <sup>1</sup>	29	<b>Miramar Greenery</b> 5180 Convoy Street San Diego, CA 92111 (100% Diversion)	27	0
Garbage/Trash <sup>2</sup>	5	<b>Miramar Landfill</b> 5180 Convoy Street San Diego, CA 92111 (0% Diversion)	0	5
<b>Total (%)</b>	<b>2,354 (100%)</b>		<b>2,347 (99.8%)</b>	<b>5 (0.2%)</b>
<p><sup>1</sup> Total Disturbance Area (94,731 SF) – Existing Amount of Impervious (89,507 SF) = Landscaping to be Cleared/Grubbed (5,224 SF) (193 CY) (±29 Tons).</p> <p><sup>2</sup> Based on Waste Stream Characteristics for the Durable Wholesale and Trucking Business Group (NAICS 493), approximately 0.2% of all waste is classified as Mixed Residue, which would result in the generation of approximately 5 tons of miscellaneous solid waste during demolition (2,349 Tons x 0.002 = 4.698 Tons).</p>				

### 3.2 GRADING PHASE

The proposed project will involve grading of the previously disturbed site. Based on the project Grading Plan, approximately 2.11 acres (98 percent) of the project site will be graded for development. The project will require approximately 29,200 cy of cut and 105 cy of fill. Approximately 26,595 cy of clean fill dirt will be exported and brought to Hanson Aggregates for recycling/handling; no material is anticipated to be imported.

#### 3.2.1 CONTAMINATED SOIL DISPOSAL

Based on the data obtained during the 2008 Phase II ESA, petroleum-impacted soil will likely be profiled as a non-hazardous waste when removed from the site and disposed of at an appropriate offsite facility. As such, the 2,500 cy of contaminated (non-hazardous) soil will be exported and taken to Miramar Landfill for disposal.

However, the Miramar Landfill does not accept contaminated soil, classified as hazardous waste or designated waste. The Applicant will be required to submit a completed Special Waste Disposal Request signed by the Applicant or agent. All required documents must be submitted to the Miramar Landfill’s Hazardous Substances Enforcement Team a minimum of two working days prior to the requested disposal date. Additionally, a Hazardous Waste Manifest will be required for each load and must accompany the load at the time of disposal.

### 3.2.2 ESTIMATED GRADING WASTE GENERATION AND DIVERSION

Excavated soil will be required to be diverted by the contractor to other locations resulting in 91.4 percent diversion from landfill waste disposal. Table 4 summarizes the quantity of grading material to be diverted or disposed of.

**Table 4: Grading Phase – Waste Generation and Diversion**

Material Type	Estimated Waste Quantity	Handling	Estimated Diversion	Estimated Disposal
Excavated Soil (not contaminated)	26,595 cy or 34,574 tons	<b>Hanson Aggregates</b> 9229 Harris Plant Road San Diego, CA 92126 (100% Diversion)	26,595 cy or 34,574 tons	0 cy or 0 tons
Excavated Soil (contaminated, non-hazardous)	2,500 cy or 3,250 tons	<b>Miramar Landfill<sup>1</sup></b> 5180 Convoy Street San Diego, CA 92111 (0% Diversion)	0 cy or 0 tons	2,500 cy or 3,250 tons
<b>Total (%)</b>	<b>29,095 cy or 37,823 tons</b>		<b>26,595 cy or 34,574 tons (91.4%)</b>	<b>2,500 cy or 3,250 tons (8.6%)</b>

<sup>1</sup> The Miramar Landfill does not accept contaminated soil, classified as hazardous waste or designated waste. The Applicant must submit a completed Special Waste Disposal Request signed by the Applicant or agent. All required documents must be submitted to the Miramar Landfill's Hazardous Substances Enforcement Team a minimum of two working days prior to the requested disposal date.

### 3.3 CONSTRUCTION PHASE

Construction activities will generate solid waste, such as packaging materials and unpainted wood, including wood pallets, and other miscellaneous debris. Construction debris will be separated on-site into material-specific containers to facilitate reuse and recycling and to increase the efficiency of waste reclamation and/or will be collected by a contracted waste hauler and separated at a facility.

Source separation of materials at the construction site is essential to (1) ensure appropriate waste diversion rate, (2) minimize costs associated with transportation and disposal, and (3) facilitate compliance with the C&D ordinance.

#### 3.3.1 ESTIMATED CONSTRUCTION WASTE GENERATION AND DIVERSION

No specific construction materials or quantities are available at this preliminary planning level. The project proposes Type II-B construction for all structures. These construction types typically consist of wood-framed structures. Floor coverings are anticipated to consist of ceramic tiling or poured concrete.

As a rule of thumb, three or more pounds per square foot of solid waste are generated during demolition, construction, and per year during ongoing use of a site (City of San Diego, 2013). City guidance states that if more specific information on waste generation is not available, the total amount of waste can be equally distributed between the types of waste expected (City of San Diego, 2013).

Overall construction materials quantities are calculated based on City guidance as follows:

$$140,935 \text{ square feet} \times \frac{3 \text{ pounds}}{\text{square foot}} \times \frac{1 \text{ ton}}{2,000 \text{ pounds}} = \pm \mathbf{212 \text{ tons}}$$

However, as specific building materials likely to be contained within the proposed structures are not known and as self-storage facilities do not fall under a typical City land use category. Therefore, ESD recommended the analysis of the project use of the most recent CalRecycle waste disposal generation rates. Additionally, waste stream characteristics were obtained by CalRecycle to better understand the types and amounts of materials disposed in and diverted from the project’s specific waste stream.

Using data provided by the North American Industry Classification System (NAICS), waste stream characteristics for warehousing and storage uses (NAICS Code 493) were obtained for the construction debris analysis to evaluate typical disposal and diversion rates for self-storage facilities, such as the project. Building materials that may generate waste and are likely to be used during construction include paper products, glass, metals, electronics, plastics, organic wastes, inert and other waste materials, special waste (ash and bulky items) and mixed residue. Attachment A: Estimated Waste Generation includes material types and categories which are likely to be used during construction of the project as provided by CalRecycle and NAICS warehousing, and storage uses.

Table 5 summarizes the categorical material types of waste generated, the approximate amount of each waste type diverted, and the approximate overall amount remaining to be disposed of in landfills. Construction waste processing facilities that may be used for the construction phase include, but are not limited to, those facilities listed. Because certified diversion rates and authorized facilities are updated quarterly and the decision on which facility will be contracted for waste hauling will be made at the time of construction, the developer reserves the right to select any authorized facility if the facility is City-certified to meet minimum diversion requirements. Construction debris will be separated on-site into material-specific containers, corresponding to the material types, to facilitate reuse and recycling and to increase the efficiency of waste reclamation.

**Table 5: Construction Phase – Waste Generation and Diversion**

Material Category	Estimated Generation (tons)	Handling/Diversion Rate <sup>1</sup>	Estimated Diversion (tons)	Estimated Disposal (tons)
Paper	56.6	<b>Allan Company Miramar Recycling</b> 5165 Convoy Street San Diego, CA 92111 (100% Diversion)	56.6	0
Glass	0.7	<b>Allan Company Miramar Recycling</b> 5165 Convoy Street San Diego, CA 92111 (100% Diversion)	0.7	0
Metals	103.5	<b>EDCO Station Transfer and Buyback Center</b> 8184 Commercial Street La Mesa, CA 91942 (73% Diversion)	75.6	29.9
Electronics	5.9	<b>Allan Company Miramar Recycling</b> 5165 Convoy Street San Diego, CA 92111 (100% Diversion)	5.9	0
Plastics	6.4	<b>EDCO Station Transfer and Buyback Center</b> 8184 Commercial Street La Mesa, CA 91942 (73% Diversion)	4.7	1.7
Organic Waste	22.3	<b>Miramar Greenery</b> 5180 Convoy Street San Diego, CA 92111 (100% Diversion)	22.3	0
Inert Waste and Other	15.0	<b>Otay C&amp;D/Inert Debris Processing Facility</b> 1700 Maxwell Road Chula Vista, CA 91913 (90% Diversion)	13.5	1.5
Special Waste	1.4	<b>EDCO Station Transfer and Buyback Center</b> 8184 Commercial Street La Mesa, CA 91942 (73% Diversion)	1.0	0.4
Mixed Residue	0.3	<b>Miramar Landfill</b> 5180 Convoy Street San Diego, CA 92111 (0% Diversion)	0	0.3
<b>Total (%)</b>	<b>212 (100%)</b>		<b>178.2 (84.1%)</b>	<b>33.8 (15.9%)</b>
<b>Source:</b> Attachment A (based on CalRecycle waste stream characteristics for the Warehousing and Storage Business Group (NAICS 493).				
<sup>1</sup> City of San Diego ESD 2020 Certified C&D Recycling Facility Directory				

In accordance with State diversion targets, a minimum of 75 percent of construction materials must be recycled. Materials to be recycled would be redirected to appropriate recipients selected from ESD’s directory of facilities that recycle construction materials, scrap metal, and yard waste. As demonstrated, 178.2 tons, or 84.1 percent, of the construction materials generated by the project are expected to be diverted from landfills.



To the extent practical, either post-consumer recycled, or pre-consumer recycled materials will be used in the construction phase. Recycled content materials reuse waste products that would otherwise be deposited in landfills. Use of local materials supports the local economy and reduces transportation. Use of rapidly renewable materials minimizes natural resource consumption and improves the stewardship of forests and related ecosystems.

## 4.0 OPERATIONS WASTE GENERATED

### 4.1 OCCUPANCY PHASE

While the project demolition, grading, and construction phases occur as one-time waste generation events, tenant/owner occupancy requires an on-going plan to manage waste disposal to meet the waste reduction goals established by the City and State.

The *University Self-Storage Project* will comply with the City’s Recycling Ordinance. In addition, SB 1383 requires the reduction of organic waste disposed of in landfills. Organic waste is comprised of food scraps and food-soiled paper from kitchens and food operations and yard waste such as garden and landscape waste, organic textiles and carpet and wood waste. Solid waste collection, including organic and green waste collection, will be provided by a private hauler.

The expected solid waste generated from the project will be approximately 5 tons per year. It is assumed that approximately two percent of the 5 tons of operational waste generated each year would be attributed to organic food waste (0.1 ton). In accordance with existing State and local regulations, at least 75 percent of project-generated solid and food waste, or 3.75 tons, will have to be diverted each year beginning with occupancy. As shown in Table 6, 3.77 tons of waste is expected to be diverted each year.

**Table 6: Occupancy Phase – Waste Generation and Diversion**

Land Use	Waste Generation Factor (per day)	Estimated Employees	Handling/Diversion Rate	Total Waste Generated (tons/year)	Estimated Waste Diverted (tons/year)	Estimated Waste Disposed (tons/year)
Warehouse (Total)	13.82 lb./employee	2	<b>EDCO Station Transfer and Buyback Center</b> 8184 Commercial Street La Mesa, CA 91942 (73% Diversion)	4.9	3.675	1.225
Warehouse (Food Waste)	2% of Total Waste Generated <sup>1</sup>	2	<b>Miramar Greenery</b> 5180 Convoy Street San Diego, CA 92111 (100% Diversion)	0.1	0.1	0.0
<b>Total</b>				5.0	3.775	1.225

Source: CalRecycle, 2022

Note: Totals may not add up due to rounding

<sup>1</sup> Total Waste Generated = 5.0 tons per year

In accordance with the Exterior Refuse and Recyclable Material Storage Areas (see Table 2 of this WMP), the project by total square footage (140,000 SF) would be required to provide a total minimum of 864 square feet of storage area for refuse, recyclable material, and organics. There is adequate area on the exterior of the building to accommodate this policy requirement, and this area is shown on the project site plan (see Figure 2).

However, as stated within the detailed storage rental agreement between the Owner/Tenant, use of the property by tenants is limited to the storage of stored property only. The tenant is strictly prohibited from storing, using, or bringing materials on or unto the premises which are classified hazardous or toxic under any law or regulation, and from engaging in any activity on the premises which produces, or may produce such materials. The tenant's obligations of indemnity as set within the storage rental agreement specifically include any costs, expenses, fines, or penalties imposed against the Owner, or which may be imposed against the Owner in any portion, or arising out of storage or presence, or alleged storage or presence of any materials in violation of the storage rental agreement. Foodstuffs, trash, garbage, or discarded materials will not be allowed in or near the stored property or otherwise on the premises. Therefore, only the office area (approximately 861 SF) is anticipated to generate refuse/recyclable/organic waste.

An indoor waste storage area of ~~56-2575~~ SF will be provided as refuse/recyclable/organic waste storage area to accommodate the waste generation by employees. Facility employees will bring their trash, recycling, and food waste to one enclosed waste storage room located on the first floor of the storage facility. In addition, to meet SDMC requirements, a designated exterior trash enclosure area totaling 804 sf will also be provided, for a total of 879 sf of trash enclosure area onsite.

On pickup days, the trash/recycling/organics bins will be wheeled outside by employees, where they will be picked up by trash hauler trucks. Bins are anticipated to be picked up one time per week. The bins will then be returned to the trash/recycling room. Bins for food waste will be provided in the trash/recycling room for collection and short-term storage prior to final collection by an appropriate, City-certified food waste hauler.

## 5.0 WASTE REDUCTION RECOMMENDATIONS

### 5.1 DEMOLITION WASTE REDUCTION

Approximately 2,354 tons of waste is expected to be generated during demolition. Approximately 2,347 tons, or 99.8 percent, of demolition material will be recycled, to include trees, concrete, asphalt, and curb and gutter. Approximately 5 tons, or 0.2 percent, of demolition material will be disposed of at an area landfill. No project-specific demolition waste reduction recommendations are necessary.

## 5.2 GRADING WASTE REDUCTION

The California Water Code and Titles 23 and 27 of the California Code of Regulations (CCR) state that soil with detectable concentrations of hazardous substances or petroleum products above interpreted background levels are “waste” following excavation. Soil containing no such detections of hazardous substances or petroleum products would be considered “inert waste” or non-impacted soil. Waste soil is required to be transported to an appropriate waste management facility and be treated, stored, or disposed, and/or reused on-Site or off-Site in accordance with applicable environmental laws and regulations. Non-impacted soil can generally be moved and reused without restriction.

Approximately 26,595 cy of non-impacted, clean excavated soil will be exported and taken to Hanson Aggregates or similar franchised hauler for recycling/handling; no material is anticipated to be imported. The remaining 2,500 cy of contaminated soil will be exported and taken to Miramar Landfill or similar facility for disposal. In total, 91.4 percent of excavated soil would be diverted from landfill waste disposal.

During grading of the project site, any petroleum contaminated soil (i.e., waste soil) or soil suspected to be contaminated that is displaced by the excavation contractor during the construction activities will be segregated, stockpiled (where appropriate), sampled and shipped to regulated receiving facilities. During the excavation activities, any contaminated soil encountered will be removed using excavators, backhoes, loaders and/or other conventional construction equipment and placed onto trucks for off-site disposal under appropriate manifesting protocols. Non-impacted soil will also be removed in a similar manner and will be tracked by bills of lading or trucking logs.

In the future basement area, mass excavation will occur in vertical lifts which are generally five feet in height. As the future basement area is excavated in appropriate sized lifts, petroleum impacted soil will be removed from the former southern UST area as it is encountered. Soil to be removed in other portions of the Site is not expected to require special handling and/or monitoring unless an unforeseen condition is encountered. If such, soil is encountered however, it will be handled by way of the same methods described in the Soil Management Plan (2019) for the southern former UST area. The Applicant shall work with the selected excavation contractor to direct and guide the excavation and proper segregation of petroleum impacted soil from non-contaminated soil.

If petroleum impacted is encountered, such soil will either be stockpiled based on visual and olfactory observations, photo-ionization detector (PID) screening for undifferentiated VOCs, stationary and/or mobile analytical laboratory sample analysis and/or professional judgment. Such soil may also be loaded directly onto trucks where petroleum impacts are unquestionably present. If soil is temporarily stockpiled during soil management activities, it will be sampled in accordance with sample frequency guidelines as specified by the selected regulated receiving facility or facilities.

Confirmation soil samples will also be obtained to assist in delineating contaminated soil from non-contaminated soil. Such samples will be collected using a stainless-steel hand trowel or auger from the base and sidewalls of the excavated areas. If any detectable levels of petroleum

hydrocarbons and/or VOCs are found in one or more of the confirmation soil samples, additional excavation will occur vertically or laterally, and additional sampling will be conducted under the same protocol as described previously. It should also be noted that if soil is encountered that exhibits petroleum hydrocarbon staining and/or odors and does not contain petroleum hydrocarbons or VOCs following laboratory analysis, it will not be exported from the Site as non-contaminated soil and will be delivered to a regulated receiving facility. In addition, excavation activities for the project will be limited to lateral and vertical distances as depicted in the forthcoming grading plan for the project. As such, over excavation of soil within the construction footprint for the purposes removing contaminated soil (if encountered) will not be conducted.

The contractor will be required to implement adequate vapor and dust control methods to minimize potential worker and public exposure to dust generated as a result of the planned excavation activities. Engineering and construction practices will be used to reduce vapor emissions including covering off-gassing excavations or stockpiles, misting excavations or stockpiles with water or other vapor suppressing agents, locating stockpiles away from and/or downwind of public receptors and stopping work until mitigation measures are in place. While potential nuisance odors are not considered to be a significant public health hazard, they will be considered a condition that requires attention and control methods. Efforts to minimize nuisance odors will be conducted in a similar manner to those to be implemented for vapor suppression purposes. Dust suppression measures will include but not be limited to covering stockpiled soil with plastic sheeting, reducing the pace of the excavation as required, and/or maintaining levels of soil moisture by means of continuous moistening. There is a zero-dust policy for the project and soil should be continuously moistened to minimize dust generated during the earthwork activities.

Due to the uncertainty associated with soil management, especially during mass excavations completed for projects in the downtown San Diego area and its neighboring communities, contaminant conditions and distribution may vary from what was originally analyzed. Following discovery of an unexpected condition that requires modification to the soil management methods and protocols described in the prepared Soil Management Plan (SMP), the plan amendments will be prepared if warranted. If any USTs are encountered during the soil management activities, the County of San Diego DEHQ Hazardous Materials Division and City of San Diego Fire Department (SDFD) will be notified, and the UST(s) will be removed under proper permits and in accordance with DEH and SDFD guidelines.

As required by the City's Construction and Demolition Ordinance, chain-of-custody procedures will be followed to establish a written record of sample handling and movement of contaminated soils between the site and the analytical laboratory. The chain-of-custodies will contain the following information:

- Project Location.
- Sample identification number.
- Date and time of collection.
- Sample collector's printed name and signature.

- Sample matrix.
- Analyses requested.
- Signatures of individuals involved in the chain of possession.

Following appropriate chain-of-custody procedures, all soils will be transported in accordance with applicable DOT regulations. Any soil transported to off-site regulated landfill or treatment facilities will be done so under proper manifesting protocol to track the movement of soil from the point of generation to the final disposal point. Non-hazardous waste manifests or uniform hazardous waste manifests will be utilized depending on the waste profiling activities to be completed. The excavation contractor will maintain one copy of all waste manifests on-site with copies provided to University Storage LLC as generator. All manifests will require a signature by the generator. The contractor will also obtain weight tickets, receipts or other documentation confirming the acceptance and disposal for all project soils deposited at the facilities and provide that information to the generator.

In order to provide complete documentation of the fieldwork activities associated with the management of any impacted soil, records will be maintained by field personnel. These records will include the following information:

- Site name and location.
- Date.
- Name of field log recorder.
- Team members present on-Site and associated duties.
- Other persons on-Site (i.e., subcontractors, regulatory personnel, etc.).
- A brief summary of meeting(s) held at the Site.
- Weather conditions.
- Maps showing the locations of excavations and descriptions of observations relative to such areas.
- Any other relevant information.

Once full implementation of the requirements contained within the SMP have been completed, a final Report of Soil Management will be prepared and approved by a State of California licensed Professional Geologist and will describe the implementation of the SMP, the results of any waste profiling, stockpile and confirmation sampling and laboratory analysis and the disposition of contaminated soil that has been exported from the project site. The report will also include plans that depict the locations of select soil samples that have demonstrated that contaminated soil was adequately segregated from non-contaminated soil and removed from the project site. Other supporting documentation to be submitted with the final report will include copies of analytical laboratory reports and copies of weight ticket reports and manifests from the regulated facilities receiving the contaminated soil to be exported from the site (Weiss Environmental, 2020).

### 5.3 CONSTRUCTION WASTE REDUCTION

In accordance with State diversion targets, a minimum of 75 percent of construction materials will be recycled. Materials to be recycled would be redirected to appropriate recipients selected from ESD's directory of facilities that recycle construction materials, scrap metal, and yard waste. As demonstrated in Table 5, 178.2 tons, or 84.1 percent, of the construction materials waste generated by the project are expected to be diverted from landfills. No project-specific construction waste reduction recommendations are necessary.

To support the anticipated diversion rate of 84.1 percent, standard construction waste management strategies utilized for this project may include, but not be limited to:

- To the extent practical, either post-consumer recycled, or pre-consumer recycled materials will be used.
- Construction debris will be separated on-site into material-specific containers to facilitate reuse and recycling and to increase the efficiency of waste reclamation and/or will be collected by a contracted waste hauler and separated at a facility.
- Contractors and subcontractors should be provided with the Final WMP.
- Proper language should be included in contractor contracts requiring compliance with the recycling plan.
- Recycling, salvage, reuse, and disposal options should be determined prior to ground disturbance activities.
- Onsite storage space availability should be evaluated for different recycling strategies, i.e., on-site, source separation and/or mixed C&D recycling, prior to ground disturbance activities
- Maximum recycling at the job site should be implemented through contractors and subcontractors – Reuse!
- Materials that can be reused can be donated to charities and nonprofit agencies, to the extent feasible.
- Advertisements can be placed in local newspapers or websites announcing salvageable and reusable materials for sale or donation.
- Haulers should be chosen based on their responsiveness to recycling plan.
- Certified Recycling Facilities should be chosen based on fees and geographic proximity to job site.
- Job site recycling areas should be clearly identified with large signs.
- Recycling bins should be placed in areas that will minimize misuse or contamination by construction workers.

To facilitate management of construction materials, the developer shall identify one person or agency connected with the proposed development to act as Solid Waste Management

Coordinator (SWMC), whose responsibility it becomes to work with all contractors and subcontractors to ensure material separation and coordinate proper disposal and diversion of waste generated. The SWMC would ensure that all contractors and subcontractors are educated and trained to follow City waste diversion regulations and that procedures for waste reduction and recycling efforts are implemented. Specific responsibilities of the SWMC would include the following:

- Review the WMP at the preconstruction meeting, including the SWMC responsibilities.
- Distribute the WMP to all contractors when they first begin work on-site and when training workers, subcontractors, and suppliers on proper waste management procedures applicable to the project.
- Work with the contractors to estimate the quantities of each type of material that would be salvaged, recycled, or disposed of as waste, then assist in documentation.
- Use detailed material estimates to reduce risk of unplanned and potentially wasteful material cuts.
- Review and enforce procedures for source-separated receptacles. Containers of various sizes shall:
  - Be placed in readily accessible areas that will minimize misuse or contamination.
  - Be clearly labeled with a list of acceptable and unacceptable materials, the same as the materials recycled at the receiving material recovery facility or recycling processor.
  - Contain no more than 10 percent non-recyclable materials, by volume.
  - Be inspected daily to remove contaminants and evaluate discarded material for reuse on-site.
- Review and enforce procedures for transportation of materials to appropriate recipients selected from ESD’s directory of facilities that recycle C&D materials.
- Ensure removal of C&D waste materials from the project site at least once every week to ensure no over-topping of containers. The accumulation and burning of onsite construction, demolition, and land-clearing waste materials will be prohibited.
- Document the return or reuse of excess materials and packaging to enhance the diversion rate.
- Coordinate implementation of a “buy recycled” program for green construction products, including incorporating mulch and compost into the landscaping.
- Coordinate implementation of solid waste mitigation with other requirements such as storm water requirements, which may include specifications such as the placement of bins to minimize the possibility of runoff contamination.

The SWMC would ensure that the project meets the following state law and SDMC requirements. Adjustments would be made as needed to maintain conformance:

- The City's C&D Debris Diversion Deposit Program, which requires a refundable deposit based on the tonnage of the expected recyclable waste materials as part of the building permit requirements (City of San Diego 2008).
- The City's Recycling Ordinance, which requires that collection of recyclable materials is provided (City of San Diego 2022b).
- The City's Storage Ordinance, which requires that areas for recyclable material collection must be provided (City of San Diego 2022c).
- The name and contact information of the waste contractor provided to ESD at least 10 days prior to the start of any work and updated within 5 days of any changes.

Prior to issuance of any certificate of occupancy/tentative certificate of occupancy, the site operator shall invite a representative of the City ESD to:

- Inspect and approve storage areas that have been provided consistent with the City's Storage Ordinance; and
- Ensure that a hauler has been retained to provide recyclable materials collection, and, if applicable, landscape waste collection; and
- Inspect and approve education materials for building tenants/owners that are required pursuant to the City's Recycling Ordinance.

#### 5.4 OPERATIONS WASTE REDUCTION

As shown in Table 6, the expected solid waste, recycling, and food waste generation per year from the project, when fully occupied, will be approximately 5 tons. Approximately 3.775 tons, or 75 percent, of the waste is expected to be diverted each year. Therefore, approximately 1.225 tons of waste will require disposal in a landfill. No project-specific operations waste reduction recommendations are necessary.

However, to ensure that no waste is generated from storage unit tenants to the extent feasible, the following project-specific waste reduction strategies are recommended:

- Tenants shall be required to take all items stored when vacating a unit.
- Tenants shall be required to agree to concise rules and regulations regarding what happens if a tenant disposes of or leaves items behind.
- In the event of illegal dumping of property at the site by tenants, management may charge a fee for illegal use of waste receptacles.
- The Owner shall undertake and/or shall specify in contract language and/or sales/lease agreements with any tenant, operator, and/or future owner, a list of recycling and diversion requirements with which the Owner or future tenants, operators, and/or owners shall be obligated to comply, including, but not limited to, the following:
- Management shall be onsite and present during vacations of storage units by tenants to ensure no personal property is left behind.



- Any personal property left behind in any storage unit shall continue to accrue rent until the items are removed. Any balance due and not paid will be turned over to collections.
- Management shall post signs in hallways or the inside of exterior-hallway doors stating all rules and regulations for leaving solid waste and personal items behind.

Management shall require all vacating tenants to sign the ‘vacate’ notice to ensure removal of tenant from rental database. To support the anticipated diversion rate of 75 percent, standard operational waste management strategies will be utilized for this project, including recycling services as required by Section 66.0707 of the City of San Diego Land Development Code. Based on current requirements, the following standard waste reduction measures will be implemented for the proposed project:

- On-site recycling services shall be provided for management-use only.
- Collection of recyclable materials will be undertaken as frequently as necessary to meet demand.
- Collection of plastic bottles and jars, paper, newspaper, metal containers, cardboard, and glass containers will be encouraged.
- Collection of other recyclable materials for which markets exist, such as scrap metal, wood pallets will be encouraged.
- Collection of food waste for recycling by composting will be encouraged.
- Utilization of recycling receptacles or containers which comply with the standards in the Container and Signage Guidelines established by the City of San Diego ESD will be required.
- Designated recycling collection and storage areas will be required.
- Signage on all recycling receptacles, containers, and/or enclosures which complies with the standards described in the Container and Signage Guidelines established by the City of San Diego ESD will be required.

#### 5.4.2 LANDSCAPING AND GREEN WASTE REDUCTION

The project landscaping plan proposes various sustainable practices that would be implemented on the project site to reduce waste generated from landscaping. Plant material selection will be guided by the macro- and micro-climate characteristics of the project site and surrounding region to encourage long-term sustainability without the excessive use of water, pesticides, and fertilizers. Irrigation of these areas will utilize reclaimed water applied via low precipitation rate spray heads, drip emitters, or other highly efficient systems. Landscape maintenance would include the collection of green waste and recycling of green waste at recycling centers that accept green waste. This will help reduce the landscaping and green waste generated by the *University Self-Storage Project* during the occupancy phase. No project-specific landscaping and green waste reduction recommendations are necessary.

### 5.4.3 FOOD WASTE REDUCTION

The project will divert project-generated food waste to comply with SB 1383. The target goal is to collect and divert at least 75 percent of organic waste from the developed project site to the recycling and composting facilities of the Miramar Landfill or other similar facilities. As described above, bins for food waste will be provided in the trash/recycling room for collection and short-term storage prior to final collection by an appropriate, City-certified food waste hauler. Employees will be educated about the available food waste reduction services as follows:

- Information, including the types of food waste materials accepted, the location of food waste collection bins, and the employees' responsibility to separate food waste from other trash and recyclables shall be distributed to all employees annually and posted in the employee break room and the waste storage area.
- All employees shall be given information and instructions upon any change in the food waste collection process for the facility.

## 6.0 CONCLUSIONS

As discussed under Regulatory Framework, a project may result in a significant direct impact under the City CEQA Significance Thresholds if it generates more than 1,500 tons of solid waste materials during construction and demolition. Projects that include the construction, demolition, and/or renovation of 40,000 SF or more of building space or generate approximately 60 tons of waste or more are considered to have potentially significant cumulative impacts on solid waste services. Further, AB 341 requires the diversion of 75 percent of solid waste and mandatory provision of recycling collection service during occupancy.

During the demolition phase, the project would produce an estimated 2,354 tons of asphalt/concrete, green waste, and trash, 98 percent of which would be diverted from the landfill. The project would achieve an overall demolition phase waste diversion rate of approximately 98 percent.

During the grading phase, the project would produce an estimated 37,823 tons of soil. Approximately 3,250 tons of soil is considered potentially contaminated and would require disposal at the Miramar Landfill. Therefore, the project would achieve an overall grading phase waste diversion rate of approximately 91.4 percent.

During the construction phase, the project would produce an estimated 212 tons of solid waste (metal, concrete, concrete/steel, asphalt, brick/masonry, wood, drywall, paper, mixed debris, and trash), and divert approximately 178.2 tons of solid waste materials from the landfill. Approximately 33.8 tons of solid waste material generated during construction is anticipated to be disposed of as non-recyclable/non-reusable waste at Miramar Landfill. The project would achieve an overall construction phase waste diversion rate of approximately 84.1 percent.

With the combined demolition, grading, and construction phases, the project would produce 40,409 tons of solid waste and would divert 37,099 tons, as identified in Table 7. This would be an overall diversion rate during preconstruction and construction of 92 percent. During occupancy, it is estimated that the project would generate approximately 5 tons of waste per year and would divert approximately 3.775 tons per year to recycling/reuse facilities. The project would achieve an overall operations phase waste diversion rate of approximately 75 percent.

**Table 7: Total Waste Generated, Diverted, and Disposed of by Phase**

Phase	Tons Generated	Tons Diverted	Tons Disposed
Demolition	2,354	2,347	5
Grading	37,823.0	34,574.0	3,250.0
Construction	212	178.2	33.8
Operation (per year)	5	3.825	1.275
<b>Total</b>	<b>40,414 (100%)</b>	<b>37,103.025 (92%)</b>	<b>3,290.075 (8%)</b>
Note: Totals may vary due to rounding			

With the oversight of the SWMC, the project would meet City waste diversion goals. Table 7 summarizes the amount of waste estimated to be generated and diverted by each phase of the project. Of the 40,414 tons estimated to be generated, 37,103.25 tons would be diverted. This would result in the diversion of 92 percent of the waste material generated from the project from the landfill, which would exceed the City’s current 75 percent waste diversion goal.

## 7.0 REFERENCES

- CalRecycle, 2022a. Waste Generation Rates – Warehouse. Based on Final Report: 1992 Washington State Waste Characterization Study: Volume 3: Generator Survey Approach (Washington State Department of Ecology). Available at <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>.
- \_\_\_\_\_. 2022b. Waste Stream Characterizations – Warehousing and Durable Trucking. Available at <https://www2.calrecycle.ca.gov/WasteCharacterization/BusinessGroupStreams>.
- City of San Diego (City). 2022a. 2022 Certified Construction & Demolition Recycling Facility Directory. Environmental Services Department. April. [https://www.sandiego.gov/sites/default/files/2018\\_certified\\_construction\\_demolition\\_recycling\\_facility\\_directory.pdf](https://www.sandiego.gov/sites/default/files/2018_certified_construction_demolition_recycling_facility_directory.pdf)
- \_\_\_\_\_. 2022b. Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7). November.
- \_\_\_\_\_. 2022c. Refuse, Organic Waste, and Recyclable Materials Storage Ordinance (Municipal Code Chapter 14, Article 2, Division 8). November.
- \_\_\_\_\_. 2016a. California Environmental Quality Act Significance Determination Thresholds. Development Services Department. Available at: [https://www.sandiego.gov/sites/default/files/july\\_2016\\_ceqa\\_thresholds\\_final\\_0.pdf](https://www.sandiego.gov/sites/default/files/july_2016_ceqa_thresholds_final_0.pdf). July, as amended.
- \_\_\_\_\_. 2016b. Construction and Demolition (C&D) Debris Recycling Fact Sheet. June 29. Available at: [https://www.sandiego.gov/sites/default/files/legacy/developmentservices/pdf/industry/infobulletin/cd\\_fact\\_sheet\\_6\\_29\\_16.pdf](https://www.sandiego.gov/sites/default/files/legacy/developmentservices/pdf/industry/infobulletin/cd_fact_sheet_6_29_16.pdf).
- \_\_\_\_\_. 2016c. City of San Diego Construction & Demolition C&D Debris Conversion Rate Table. June 6. 2015. City of San Diego Zero Waste Plan. July. Available at: <https://www.sandiego.gov/sites/default/files/legacy/mayor/pdf/2015/ZeroWastePlan.pdf>.
- \_\_\_\_\_. 2014. City of San Diego Waste Characterization Study. January. Available at: <https://www.sandiego.gov/environmental-services/recycling#Waste%20Characterization>
- \_\_\_\_\_. 2013. California Environmental Quality Act: Guidelines for a Waste Management Plan. June. Available at: <http://www.sandiego.gov/environmental-services/pdf/recycling/wmpguidelines.pdf>.
- \_\_\_\_\_. 2012. City of San Diego Waste Generation Factors – Occupancy Phase. October 1.
- \_\_\_\_\_. 2008. Construction and Demolition Debris Deposit Ordinance (Municipal Code Chapter 6, Article 6, Division 6). January 1.
- \_\_\_\_\_. 1997. Refuse and Recyclable Materials Storage Regulations (Municipal Code Chapter 14, Article 2 Division 8). December 9.

County of San Diego Department of Environmental Health and Quality (DEHQ). 1998a. Underground Storage Tank (UST) Case Unauthorized Release No. H05330-001 (South Tank) – Closure Letter. Prepared by Chuck Pryatel on October 13, 1998.

\_\_\_\_\_. 1998b. Underground Storage Tank (UST) Case Unauthorized Release No. H05330-002 (North Tank) – Closure Letter. Prepared by Chuck Pryatel on October 13, 1998.

Weiss Environmental, LLC. 2019. Soil Management Plan for 5150 University Avenue, San Diego, CA. Prepared September 28, 2020.

ATTACHMENT A