

MEMORANDUM

To: Jonathan Frankel, New Urban West, Inc.

From: Adam Poll, Dudek

Subject: Waste Management Plan for Trails at Carmel Mountain Ranch Project

Date: July 24, 2020

cc: Alexandra Martini, Dudek; Carey Fernandez; Dudek

1 Introduction

The purpose of this Waste Management Plan (WMP) for the Trails at Carmel Mountain Ranch Project (project) in the City of San Diego (City) is to provide analysis of the solid waste impacts anticipated for the project and consider how those impacts will be mitigated. The goal of this WMP is to identify sufficient mitigation to reduce the potential impacts of the project on solid waste services. Two acceptable approaches to managing waste are to reduce the amount disposed to 60 tons or less, or to divert 75% or more of the total waste, thus meeting the goal established by Assembly Bill (AB) 341.

The proposed project area consists of approximately 164.5 acres of land within the previous Carmel Mountain Ranch Golf Course property located in northeast San Diego County, in the Carmel Mountain Ranch community within the City (Figure 1, Project Location). The project area, while interspersed between sections of existing residential development, is generally located north of Ted Williams Parkway, south of Carmel Mountain Road, east of Pomerado Road, and is bounded by California Interstate 15 Expressway (I-15) on the west. The approximate centroid of the project area is within Section 10 of Township 14 South, Range 2 West, of the Poway, California U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle.

The proposed project includes a total of 1,200 multi-family homes and a mix of open space and recreational uses. Residential land uses would compose approximately 53.2 acres and would range in density from 12.94 to 37.43 dwelling units per acre, incorporating a variety of building types such as townhomes, garden walk-ups, stacked flats and apartments, among others. All proposed new residential construction would be set back 50 feet from existing residential developments in the vicinity. Open space uses would be composed of approximately 111 acres, which includes approximately 6 miles of publicly accessible trails and 9.79 acres of publicly accessible parkland.

In addition, the project proposes a 12,000 square foot pad for future development of a community art gallery/studio located near the existing Carmel Mountain Ranch library. This gallery may include up to 6,000 sf in one or two buildings to house gallery space, studio space with an indoor kiln and bathroom/kitchen. In addition, this amenity could include up to 2,000 square foot outdoor open shed structure to house wood-burning ceramic kiln, wood storage and a washing area. A 3,000 square foot café/restaurant/banquet area is proposed with 2,000 square foot of dining space and a 1,000 square foot kitchen. On additional caretaker unit up to 1,500 square feet would also be proposed. This gallery/studio would be privately owned by a non-profit, not for dedication to the City or homeowner's association. This Community Plan Land Use proposed is Multiple Use – Neighborhood Village. It would be rezoned to be CN-1.



This WMP consists of two sections corresponding to the implementation of site development: the Construction Phase (to include demolition) and the Operational Phase (post-construction). The WMP addresses the projected amount of waste that could be generated by the project based on current (2009) City generation rates and estimates; waste reduction goals; and recommended techniques to achieve the waste reduction goals, such as recycling. The project includes a 2-month demolition phase. Construction of the project will take approximately 143 months. Construction will take place over seven discrete phases and is estimated to begin in February 2021 and run through December 2026. Operation is assumed to begin in January 2027. Waste disposal sites and recycling methods and opportunities available during construction and operation may change from those available today. Therefore, this WMP includes the following general information known at the time the WMP was prepared:

- Projected waste generation calculations and identification of types of waste materials generated;
- Source separation techniques for waste generated;
- How materials may be re-used on site;
- Name and location of current recycling, re-use, and landfill facilities where waste will be disposed of if not reused on site;
- A "buy recycled" program;
- Measures to be implemented directed at reducing construction debris;
- Method(s) for communicating waste reduction and recycling goals to subcontractors;
- A general time line for construction and development; and
- A list of required progress and inspections by City staff, based on current ordinances.

2 Background

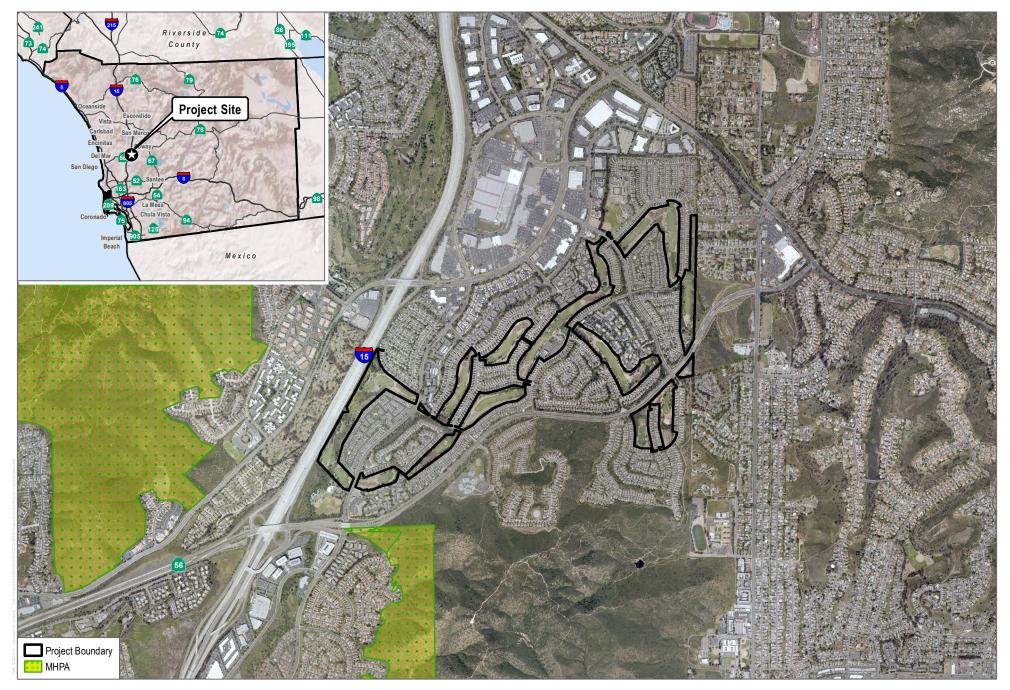
In 1989, the California Legislature passed AB 939, the Integrated Waste Management Act, which mandated that all cities reduce waste disposed in landfills from generators within their borders by 50% by the year 2000. AB 939 required all local governments to prepare a Source Reduction and Recycling Element, which incorporated waste management policies and programs to achieve the mandated waste reduction. Since 2004, the City has diverted more than 50% of its generated waste stream from disposal. This bill specified that solid waste should be considered by the equation GENERATED = DISPOSED + DIVERTED. "Diverted" materials are put into a hierarchy in the law, as follows:

- First source reduction, such as using a reusable bag, making double-sided copies, or other measure that stops waste at the source.
- Secondary measures include recycling and composting. Because these measures often have transportation and processing impacts, they are considered less preferable than source reduction.
- In the Public Resources Code, various methods of transformation for energy production are limited to 10% of the total waste reduction target.

In 2008, Senate Bill (SB) 1016 was chaptered. Known as the Solid Waste Disposal Measurement Act, SB 1016 maintained the 50% diversion requirement, but changed to a disposal-based measurement system, expressed as the 50% Equivalent Per Capita Disposal Target. This established a goal of not recycling more, but disposing of less. AB 341, Jobs and Recycling, chaptered in 2011, expanded recycling to every multifamily dwelling and business and charged the California Department of Resources Recycling and Recover (CalRecycle) with the responsibility for ensuring that the State was recycling at least 75% of the garbage generated by 2020. In effect, SB 1016 established

that compliance with State law is measured by reducing the amount of waste material requiring disposal, and AB 341 increased the diversion target to 75%.

Additional local regulation pertaining to solid waste management includes San Diego Municipal Code (SDMC) Chapter 14, Article 2, Division 8, Sections 142.0810 and 142.0820; Chapter 6, Article 6, Division 7, Sections 66.0706, 66.0709, and 66.0710; and Chapter 6, Article 6, Division 6, Sections 66.0711, 66.0604, and 66.0606. These statues designate refuse and recycling space allocation requirements for on-site storage, construction and demolition debris diversion regulations, and recyclable material diversion regulations. On December 16, 2013, the City Council adopted a Zero Waste Objective that established the targets for 75% diversion of waste from landfills by 2020, 90% by 2035, and Zero Waste by 2040.



SOURCE: USGS 7.5-Minute Series Poway Quadrangle

FIGURE 1
Project Location

2.1 City of San Diego Requirements

The City has established a threshold of 40,000 square feet of building space as generating sufficient waste (60 tons) to have a potentially cumulatively significant impact on solid waste services (City of San Diego 2016). The project as proposed exceeds this threshold. The City also established a threshold of 1,000,000 square feet of building space as generating sufficient waste (1,500 tons or more) to have a direct impact on solid waste facilities. Although the project has a total of more than 1,000,000 square feet of building space, it does not exceed the threshold of 1,500 tons of waste per year. The purpose of this WMP therefore is to identify mitigation measures to reduce this potential impact to below a level of significance.

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

The City's Construction and Demolition (C&D) Debris Diversion Deposit Program applies to all applicants for building, demolition, and removal permits. This ordinance (SDMC Section 66.0601) requires that the applicant post a deposit (Table 1, C&D Debris Deposit Table), which is held by the City until the applicant demonstrates that a minimum amount of the material generated has been diverted from landfills. The ordinance requires demotion and new construction projects to divert 65% of the waste produced during the project.

Mixed construction debris recycling facilities in the City 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 68% or less diversion rate. Single material recyclers, such as metal recyclers, often achieve a nearly 100% diversion rate. When comingled materials are sent to a mixed facility, the 75% diversion goal established by AB 341 will not be met. Depending on the project, to ensure that the overall diversion goal is attained, some materials must be separated and trucked to facilities with higher diversion rates, such as aggregate and metal recyclers.

Table 1. C&D Debris Deposit Table

Deposit Types		Minimum ft² Subject to the Ordinance		Range of Deposits
Residential new construction, non- residential alterations, demolition	\$0.40	1,000	100,000	\$400-\$40,000
Non-residential new construction	\$0.20	1,000	50,000	\$200-\$10,000
Flat Rate				
Residential alterations*	\$1,000	1,000	6,999	\$1,000

Notes: C&D = construction and demolition; ft2 = square feet.

^{*} Residential Alterations 7,000 square feet and greater in size, and hotels are considered Non-Residential Alterations.

2.2 Exterior Refuse and Recyclable Material Storage Area Requirements

Construction of the project will take approximately 56 months. Construction will take place over seven discrete phases and is estimated to begin in February 2022. Because the project is a residential and commercial development, exterior refuse and recyclable material storage areas will be provided in accordance with City regulations per SDMC Sections 142.0820 and 142.0830.

2.3 Exterior Refuse and Recyclable Material Storage Areas for Project

The project is a residential and commercial development. Table 2, Minimum Exterior Refuse and Recyclable Material Storage Areas for Residential Developments, shows the required amount of refuse and recyclable storage areas for the residential portion of the project. The project proposes 1,200 multifamily homes. As a result, the project would require a minimum of 4,604 square feet of storage area (2,302 square feet refuse storage area plus 2,302 square feet recyclable material storage area).

Table 2. Minimum Exterior Refuse and Recyclable Material Storage Areas for Residential Developments

Number of Dwelling Units Per Development	Minimum Refuse Storage Area per Development (square feet)	Minimum Recyclable Material Storage Area per Development (square feet)	Total Minimum Storage Area per Development (square feet)
2-6	12	12	24
7-15	24	24	48
16-25	48	48	96
26-50	96	96	192
51-75	144	144	288
76-100	192	192	384
101-125	240	240	480
126-150	288	288	576
151-175	336	336	672
176-200	384	384	768
201+	384 plus 48 square feet for every 25 dwelling units above 201	384 plus 48 square feet for every 25 dwelling units above 201	768 plus 96 square feet for every 25 dwelling units above 201

Source: SDMC § 142.0820, Table 142-08B.

Table 3, Minimum Exterior Refuse and Recyclable Material Storage Areas for Commercial and Industrial Development, shows the required amount of refuse and recyclable storage areas for the commercial portion of the project. The project proposes 12,000 square feet of commercial space. As a result, the project would require a minimum of 96 square feet of storage area (48 square feet refuse storage area plus 48 square feet recyclable material storage area).

Table 3. Minimum Exterior Refuse and Recyclable Material Storage Areas for Residential Developments

Gross Floor Area Per Development (Square Feet)	Minimum Refuse Storage Area per Development (square feet)	Minimum Recyclable Material Storage Area per Development (square feet)	Total Minimum Storage Area per Development (square feet)
0-5,000	12	12	24
5,000-10,000	24	24	48
10,001-25,000	48	48	96
25,001-50,000	96	96	192
50,001-75,000	144	144	288
75,001-100,000	192	192	384
100,001+	•	every 25,000 square feet of	384 plus 96 square feet for every 25,000 square feet of building area above 100,001

Source: SDMC § 142.0830, Table 142-08C.

3 Existing Conditions

Currently, the project site is a former 18-hole golf course surrounded by existing residential development. The golf course is no longer active, although the Carmel Mountain Ranch clubhouse can still be rented out and used for special events. The site is primarily characterized by disturbed, fallow land left over from the previous golf course use. Surrounding land uses include residential development in all directions. As a result, the site is subject to a number of previous and ongoing anthropogenic disturbances that include pedestrian use, domestic pet use (i.e., dogs and cats), invasive species, and regular night lighting and noise. The hydrology and vegetation composition of the site has changed dramatically since the golf course operations have ceased. A majority of the site experiences overgrowth of weeds and existing plant materials.

4 Proposed Conditions

The proposed project includes 1,200 multifamily homes and a mix of open space and recreational uses and a 12,000 square foot art studio. Residential land uses would compose approximately 52 acres and would range in density from 14.5 to 43.5 dwelling units per acre. Open space uses would be composed of approximately 112 acres, which includes approximately 6 miles of publicly accessible trails. Grading for the proposed project would be balanced on site with 995,763 cubic yards of cut and fill. There will be no export of materials during the grading phase of the project.

The project requires discretionary approval including: General Plan Amendment, Community Plan Amendment, Rezone, Master Planned Development Plan, Site Development Permit, Vesting Tentative Map and Rescission of the Conditional Use Permit for the golf course. Construction practices will comply with local, State, and Federal regulations regarding the handling of building materials to ensure waste minimization requirements are met.

5 Demolition Waste

Demolition and construction will occur over a period of approximately 2 months. The City's Environmental Services Department (ESD) staff would be present for an early pre-construction meeting to evaluate waste segregation, signage, and salvage.

The project site is the location of existing former 18-hole golf course. The demolition phase will include the deconstruction/demolition and removal of the existing clubhouse, associated structures, asphalt parking and walkway areas, and interior landscaping. Approximately 10,608 tons of waste is expected to be generated during demolition. Approximately 5,391 tons of material would be recycled, including trees, concrete, asphalt, foundations, building structure, masonry walls, curb and gutter, and green waste. Approximately 5,217 tons of debris would be transported to a landfill, including non-useable lumber, drywall, glass, miscellaneous trash, roofing paper, broken roof tiles, and floor tile. Table 4, Project Waste Generation – Demolition, summarizes the type and amount of demolition materials, as well as diversion/disposal, anticipated from the project. Recycled materials would be redirected to appropriate recipients selected from ESD's directory of facilities that recycle demolition materials, scrap metal, and yard waste, as indicated in Table 4 below.

Table 4. Project Waste Generation - Demolition

Material Type	Estimated Waste Quantity (tons)	Handling	Estimated Diversion (tons)	Estimated Disposal (tons)
Asphalt and concrete	2,428	Hanson Aggregates 9229 Harris Plant Road San Diego, California 92126 (100% diversion)	2,428	_
Landscape materials	2,963	Miramar Greenery 5180 Convoy Street San Diego, California 92111 (100% diversion)	2,963	_
Non-usable C&D materials	5,217	Miramar Landfill 5180 Convoy Street San Diego, California 92111 (0% diversion)	_	5,217
Tota	10,608	,	5,391	5,217

Note: C&D = construction and demolition.

6 Construction Waste

Construction activities would generate waste, including packaging materials, wood pallets, and other miscellaneous debris. Construction debris would be separated on site into material-specific containers to facilitate reuse and recycling and to increase the efficiency of waste reclamation in accordance with this WMP. Source separation of materials at the construction site is essential to (1) ensure the appropriate waste diversion rate is met, (2) minimize costs associated with transportation and disposal, and (3) facilitate compliance with the C&D ordinance. The types of construction waste anticipated to be generated include the following:

Asphalt and Concrete

Landscape Debris

Mixed C&D Debris

Garbage/Trash

In accordance with State diversion targets, a minimum of 75% of construction materials will be recycled (see Table 4). Recycled materials would be redirected to appropriate recipients selected from ESD's directory of facilities that recycle construction materials, scrap metal, and yard waste.

6.1 Managing Construction Material

To facilitate the management of construction materials, the applicant will identify one person or agency connected with the proposed development to act as Solid Waste Management Coordinator, who will be responsible for working with all contractors and subcontractors to ensure material separation and coordinating the proper disposal and diversion of waste generated. The Solid Waste Management Coordinator will ensure all diversion practices outlined in this WMP are upheld.

The responsibilities of the Solid Waste Management Coordinator, include, but are not limited to, the following:

- Review this WMP, including the responsibilities of Solid Waste Management Coordinator.
- Review and update procedures as needed for material separation and verify availability of containers and bins needed to avoid delays.
- Review and update procedures for periodic solid waste collection and transportation to recycling and disposing facilities.
- Educate contractors and subcontractors regarding the requirements of this WMP and ensure that the contractors and subcontractors carry out the measures described in the WMP.
- Ensure ESD attendance at a preconstruction meeting, assure compliance with segregation requirements, and verify recycled content in base materials.
- Ensure that contamination rates in bins remain below 5% by weight of the bin.
- Issue stop work orders if proper procedures are not being followed.

The contractors shall be required to perform daily inspections of the construction site to ensure compliance with the requirements of this WMP and all other applicable laws and ordinances and shall report directly to the Solid Waste Management Coordinator. Daily inspections will include verifying the availability and number of dumpsters based on the amount of debris being generated, correct labeling of dumpsters, proper sorting and segregation materials, and salvaging of excess materials. Additionally, the following apply:

- Recycling areas will be clearly identified with large signs, approved by ESD, and sufficient amounts of material-specific bins will be provided for necessary segregation.
- Recycling bins will be placed in areas that are readily accessible to contractors/subcontractors and in areas
 that will minimize misuse or contamination by employees and the public.
- The construction waste for the project was estimated based on the 2003 United States Environmental Protection Agency (EPA) survey report titled, Building-Related Construction and Demolition Materials Amounts (EPA 2003). Based on EPA's survey, the project is estimated to generate 3,489 tons of waste during construction. Table 5, Project Waste Generation Construction, is included below to summarize the types of waste generated, the amount of each waste type diverted, and the overall amount that will be transported to landfills.

Table 5. Project Waste Generation – Construction

Material Type	Estimated Waste Quantity (tons)	Handling	Estimated Diversion (tons)	Estimated Disposal (tons)
Asphalt and concrete		Hanson Aggregates 9229 Harris Plant Road San Diego, California 92126 (100% diversion)	217	_
Landscape debris		Miramar Greenery 5180 Convoy Street San Diego, California 92111 (100% diversion)	846	_
Mixed C&D debris	,	Otay C&D/Inert Debris Processing Facility 1700 Maxwell Road Chula Vista, California 91913 (79% diversion)	1,917	509
Total	3,489		2,980	509

Note: C&D = construction and demolition.

Construction debris will be separated on site into material-specific containers, corresponding to the materials types in Table 5, to facilitate reuse and recycling and to increase the efficiency of waste reclamation.

7 Operational Waste

While the construction phase for the project occurs as a one-time waste generation event, project operation requires an on-going plan to manage waste disposal to meet the waste reduction goals established by the City and State. Towards that end, the project will comply with the City's Recycling Ordinance.

In accordance with the City's General Plan Conservation Element, project will reduce its "environmental footprint" through a variety of sustainable design features, including compliance with the Uniform Building Code (UBC) and Title 24 requirements for building materials and insulation in order to reduce unnecessary loss of energy.

7.1 Implementation

The following two tables express the anticipated refuse and recyclable storage requirements based on SDMC Table 142-08B and 142-08C.

Table 6. Minimum Exterior and Recyclable Material Storage Areas for the Project

Land Use		Minimum Refuse Storage Area (square feet)	Minimum Recyclable Material Storage Area (square feet)	
Residential	1,200 units	2,302	2,302	4,604
Commercial	12,000 square feet	48	48	96

The project would be required to provide a minimum of 2,302 square feet of refuse storage area and a minimum of 2,302 square feet of recyclable material storage area for a total of 4,604 square feet of minimum exterior refuse and recyclable material storage area for residential use. The project would be required to provide a minimum of 48 square feet of refuse storage area and a minimum of 48 square feet of recyclable material storage area for a total of 96 square feet of minimum exterior refuse and recyclable material storage area for commercial use.

As shown in Table 7, Estimated Solid Waste Generation from the Project – Occupancy Phase, the expected waste generated per year from the project when fully occupied would be approximately 281 tons. The operational solid waste generation was estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2. The CalEEMod uses annual waste disposal rates from CalRecycle data for individual land uses. If waste disposal information was not available, waste generation data was used. CalEEMod uses the overall California Waste Stream composition to generate the necessary types of different waste disposed into landfills.

Table 6. Estimated Solid Waste Generation from the Project – Occupancy Phase

			Estimated Waste Generated (tons/year)*
Residential	1,200,000	0.0002325	279
Commercial	12,000	0.000133	2

Note:

On-site recycling services shall be provided. All occupants shall participate in a recycling program by separating recyclable materials from other solid waste and depositing the recyclable materials in the recycling container provided for each unit. Recycling services are required by SDMC Section 66.0707. Based on current requirements, these services shall include the following:

- Collection of recyclable materials as frequently as necessary to meet demand;
- Collection of plastic bottles and jars, paper, newspaper, metal containers, cardboard, and glass containers;
- Collection of other recyclable materials for which markets exist, such as scrap metal, wood pallets;
- Collection of food waste for recycling by composting, where available (prior to issuance of building and
 occupancy permits, the applicant will meet with representatives from ESD to ensure that their educational
 materials and haulers can comply with the requirements for this service);
- Use of recycling receptacles or containers that comply with the standards in the Container and Signage Guidelines established by ESD;
- Designated recycling collection and storage areas; and
- Signage on all recycling receptacles, containers, chutes, and/or enclosures that complies with the standards described in the Container and Signage Guidelines established by ESD.

As required by SDMC Section 66.0707, the recycling hauler shall ensure that occupants are educated about the available recycling services by providing:

• Information, including the types of recyclable materials accepted, the location of recycling containers, and the occupants' responsibility to recycle, shall be distributed to all occupants annually;

^{*} Estimated using the California Emissions Estimator Model 2016.3.2.

- Information and instructions to all new occupants upon move-in; and
- Information and instructions to all occupants upon any change in recycling service.

7.2 Landscaping and Green Waste Recycling

Plant material selection will be guided by the macroclimate and microclimate characteristics of the project site and surrounding region to encourage long-term sustainability without the excessive use of water, pesticides and fertilizers. Irrigation of the project site, where practical, will utilize reclaimed water applied via low precipitation rate spray heads, drip emitters, or other highly efficient systems. Landscape maintenance of common areas would include the collection of green waste and disposal of green waste at recycling centers that accept green waste by the contracted waste hauler. This will help further reduce the waste generated by the project during operation.

8 Conclusion

The City Development Services Department is requiring that this Preliminary WMP be prepared and submitted to ESD. Since the project is in the design phase, this is only a preliminary plan, which specifies the intent to meet the requirements of the City's Significance Determination Thresholds (City of San Diego 2016). Prior to the issuance of any permits for construction of the project, a final WMP shall be submitted to ESD for review and approval.

This WMP will be implemented to the fullest degree of accuracy and efficiency. Additionally, the project will be required to adhere to City ordinances, including the C&D Debris Diversion Deposit Program, the City's Recycling Ordinance, and the Refuse and Recyclable Materials Storages Regulations. This WMP is designed to implement and adhere to all City waste management requirements. The measures in this WMP would ensure that impacts are mitigated to below a level of significance.

Prior to the issuance of any grading or construction permits, the Solid Waste Coordinator will ensure ESD's attendance at a pre-construction meeting. The Solid Waste Management Coordinator will ensure that: 1) the proposed approach to contractor education is approved by ESD; 2) the written specifications for base materials, concrete pavers, decomposed granite, and mulch, is approved by ESD; and 3) that the ESD inspector approves the separate waste containers, signage, and hauling contract(s) for the following materials:

- Asphalt/Concrete
- Brick/Masonry/Tile
- Cardboard
- Carpet/Padding/Foam
- Drywall
- Roofing materials

- Landscape Debris
- Mixed C&D Debris
- Scrap Metal
- Untreated wood waste
- Garbage/Trash

The following standard mitigation applies to the project to reduce cumulative impacts on solid waste to below a level of significance:

- I. Prior to Permit Issuance or Bid opening/Bid award
 - A. Land Development Review Plan check

- 1. Prior to the issuance of any construction permit, including but is not limited to, demolition, grading, building or any other construction permit, the Assistant Deputy Director Environmental Designee shall verify that the all the requirements of the Refuse & Recyclable Materials Storage Regulations and all of the requirements of the waste management plan are shown and noted on the appropriate construction documents. All requirements, notes and graphics shall be in substantial conformance with the conditions and exhibits of the associated discretionary approval.
- 2. The construction documents shall include a waste management plan that addresses the following information and elements for demolition, construction, and occupancy phases of the project as applicable:
 - a. tons of waste anticipated to be generated.
 - b. material type of waste to be generated,
 - c. source separation techniques for waste generated,
 - d. how materials will be reused on site.
 - e. name and location of recycling, reuse, or landfill facilities where waste will be taken if not reused on site,
 - f. a "buy recycled" program,
 - g. how the project will aim to reduce the generation of construction/ demolition debris,
 - h. a plan of how waste reduction and recycling goals will be communicated to subcontractors,
 - i. a time line for each of the three main phases of the project as stated above,
 - j. a list of required progress and final inspections by City staff
- 3. The plan shall strive for a goal of 75% waste reduction.
- 4. The plan shall include specific performance measures to be assessed upon the completion of the project to measure success in achieving waste minimization goals.
- 5. The Plan shall include notes requiring the Permittee to notify Mitigation Monitoring Coordination (MMC) and ESD when inspections are needed. The permittee shall arrange for progress inspections, and a final inspection, as specified in the plan and shall contact both MMC and ESD to perform these periodic site visits during construction to inspect the progress of the project's waste diversion efforts.

Notification shall be sent to:

MMC Environmental Review Specialist Development Service Department 9601 Ridgehaven Court Ste. 320, MS 1102 B San Diego, California 92123 1636 619.980.7122

Environmental Services Department 9601 Ridgehaven Court Ste. 320, MS 1103 B San Diego, California 92123 1636 858.627.3303

- 6. Prior to the issuance of any grading or building permit, the applicant shall receive approval, in writing, from the ADD of LDR's environmental designee (MMC) that the waste management plan has been prepared, approved, and implemented. Also prior to the issuance of any grading or building permit, the applicant shall submit written evidence to the ADD that the final Demolition/Construction report has been approved by MMC and ESD. This report shall summarize the results of implementing the above Waste Management Plan elements, including: the actual waste generated and diverted from the project, the waste reduction percentage achieved, and how that goal was achieved, etc.
- II. Prior to Start of Construction

A. Pre-Construction Meeting

- 1. Demolition Permit Prior to issuance of any demolition permit, the permittee shall be responsible to obtain written verification from MMC indicating that the permittee has arranged a preconstruction meeting to coordinate the implementation of the MMRP. The Pre-Construction Meeting that shall include: the Construction Manager, Demolition/Building/Grading Contractor; MMC; and ESD and the Building Inspector (BI) and/or the Resident Engineer (RE) (whichever is applicable) to verify that implementation of the waste management plan shall be performed in compliance with the plan approved by LDR and the San Diego ESD, to ensure that impacts to solid waste facilities are mitigated to below a level of significance.
- 2. At the Pre-Construction Meeting, The Permittee shall submit three (3) reduced copies (11" x 17") of the approved waste management plan, to MMC (2) and ESD (1).
- 3. Prior to the start of demolition, the Permittee/the Construction Manager shall submit a construction/demolition schedule to MMC and ESD.
- B. Grading and Building Permit Prior to issuance of any grading or building permit, the permittee shall be responsible to arrange a preconstruction meeting to coordinate the implementation of the MMRP. The Pre-Construction Meeting that shall include: the Construction Manager, Building/Grading Contractor; MMC; and ESD and the Building Inspector and/or the RE (whichever is applicable) to verify that implementation of the waste management plan shall be performed in compliance with the plan approved by LDR and the San Diego ESD, to ensure that impacts to solid waste facilities are mitigated to below a level of significance.
 - 1. At the Pre-Construction Meeting, the Permittee shall submit reduced copies (11" x 17") of the approved waste management plan, the RE, BI, MMC, and ESD.
 - 2. Prior to the start of construction, the Permittee/Construction Manager shall submit a construction schedule to the RE, BI, MMC, and ESD.

III. During Construction

The Permittee/Construction Manager shall call for inspections by the RE/BI and both MMC and ESD, who will periodically visit the demolition/construction site to verify implementation of the waste management plan. The Consultant Site Visit Record (CSVR) shall be used to document the Daily Waste Management Activity/progress.

IV. Post Construction

- A. Within 30 days after the completion of the implementation of the Mitigation Monitoring Reporting Program (MMRP), for any demolition or construction permit, a final results report shall be submitted to both MMC and ESD for review and approval to the satisfaction of the City. MMC will coordinate the approval with ESD and issue the approval notification.
- B. Prior to final clearance of any demolition permit, issuance of any grading or building permit, release of the grading bond and/or issuance of any Certificate of Occupancy, the permittee shall provide documentation to the ADD of LDR that the waste management plan has been effectively implemented.

9 References

City of San Diego. 2016. Significance Determination Thresholds. July. Accessed November 2019. https://www.sandiego.gov/sites/default/files/july_2016_ceqa_thresholds_final_0.pdf. EPA (United States Environmental Protection Agency). 2003. Estimating Building Related Construction and Demolition Materials Amounts. Accessed November 2019. https://www.epa.gov/sites/production/files/2017-09/documents/estimating2003buildingrelatedcanddmaterialsamounts.pdf.